STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED
07/31/26
11:11 AM
R2511005

July 31, 2026

Agenda ID #24421
Quasi-legislative

TO PARTIES OF RECORD IN RULEMAKING 25-11-005:

This is the proposed decision of Commissioner John Reynolds. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's September 3, 2026 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

/s/ MICHELLE COOKE
Michelle Cooke
Chief Administrative Law Judge

MLC:nd3
Attachment

Decision **PROPOSED DECISION OF COMMISSIONER JOHN REYNOLDS**
(Mailed 7/31/2026)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Update the California LifeLine Program.	Rulemaking 25-11-005

DECISION ADOPTING DISASTER RELIEF PROTECTIONS FOR CALIFORNIA LIFELINE PARTICIPANTS AND OTHER PROGRAM MODIFICATIONS TO REFLECT CHANGES IN FEDERAL POLICY

TABLE OF CONTENTS

Title **Page**

DECISION ADOPTING DISASTER RELIEF PROTECTIONS FOR CALIFORNIA LIFELINE PARTICIPANTS AND OTHER PROGRAM MODIFICATIONS TO REFLECT CHANGES IN FEDERAL POLICY 1
Summary 2
1. Background 2
1.1. History of California LifeLine Customer Protections in Disaster Situations 2
1.2. Background on the Federal Revocation of California's Ability to Streamline LifeLine Application and Renewal Processes 4
1.3. Procedural Background 6
1.4. Submission Date 7
2. Issues Before the Commission 7
3. Permanent Disaster Relief Protections for California LifeLine Participants 8
3.1. Permanent Adoption and Geographic Scope of Protections for LifeLine Customers 10
3.1.1. Party Positions 10
3.1.2. Adoption of Permanent Protections 12
3.1.3. Geographic Scope of Protections 14
3.2. Decision 18-08-004's Automatic Protections for LifeLine Customers and Additional Recommendations 16
3.2.1. Customer Outreach and Additional Recommendations 17
3.3. Timing and Duration of LifeLine Customer Protections 21
3.4. Default LifeLine Eligibility Based on Enrollment in Other Disaster Relief Programs 26
3.5. Make-Up of Federal Support During a Disaster 27
3.6. Implementation 28
4. Federal Policy Changes and California LifeLine 29
4.1. Applications and Eligibility Determinations for California LifeLine and Federal Lifeline, Related Outreach 32
4.1.1. Party Positions on Application and Enrollment Issues 32
4.1.2. Discussion of Application and Enrollment Issues 38
4.1.3. Party Positions on Customer Education and Outreach 41
4.1.4. Discussion of Customer Education and Outreach Requirements 43
4.2. General Make-Up of Federal Support and Tariff Updates 47

4.3. Data Collection 50
4.4. Renewal Processes 53
4.5. Additional Guidance Related to Program Implementation Following the FCC's Order 54
5. Revisions to General Order 153-A 59
6. Summary of Public Comment 63
7. Conclusion 64
8. Comments on Proposed Decision 65
9. Assignment of Proceeding 65
Findings of Fact 65
Conclusions of Law 71
ORDER 76

Attachment A — General Order 153-A

DECISION ADOPTING DISASTER RELIEF PROTECTIONS FOR CALIFORNIA LIFELINE PARTICIPANTS AND OTHER PROGRAM MODIFICATIONS TO REFLECT CHANGES IN FEDERAL POLICY

Summary

This decision adopts customer protections applicable to California Universal Telephone Service Program (LifeLine) participants in areas affected by certain emergencies or disasters. These measures will help prevent low-income Californians from losing access to essential communications services following a declaration of an emergency. This decision adopts modifications to General Order (G.O.) 153-A to reflect these permanent disaster relief protections.

This decision also adopts modifications to G.O. 153-A made necessary by the Federal Communications Commission's (FCC) Wireline Competition Bureau's November 20, 2025, Order, *In the Matter of Lifeline and Link Up Reform and Modernization* (FCC Order). This decision provides additional guidance to LifeLine customers and LifeLine service providers navigating program changes stemming from the FCC Order, which revoked California's ability to make federal Lifeline eligibility determinations.

Finally, this decision formalizes the Commission's mechanism by which G.O. 153-A's provisions may be temporarily waived or suspended.

The proceeding remains open.

1. Background

1.1. History of California LifeLine Customer Protections in Disaster Situations

In 2017, the California Public Utilities Commission (Commission) adopted Resolution (Res.) M-4833 and Res. M-4835 which required electric, gas, telephone, water, and sewer utilities to take reasonable and necessary steps to assist Californians affected by a series of devastating wildfires in Northern and Southern California that year.

Subsequently, the Commission initiated Rulemaking (R.) 18-03-011 to consider whether the Commission should adopt permanent rules for post-disaster protections applicable to utilities under its jurisdiction. In Decision (D.) 18-08-004, the Commission adopted the protections in Res. M-4833 and Res. M-4835 as interim measures that would go into effect if a state of emergency was declared by the governor of California due to a disaster that disrupted utility service or degraded the quality of utility service while R.18-03-011 was ongoing. The interim protections applicable to California Universal Telephone Service Program (LifeLine, California LifeLine, or Program) customers adopted by these resolutions and D.18-08-004 were as follows:

- Suspension of the LifeLine renewals process, which eliminated the need for affected LifeLine customers to submit documentation to re-establish eligibility for the Program; and
- Suspension of de-enrollment of LifeLine customers who do not use their discounted telephone service for a specified period of time (*i.e.*, suspension of what is referred to as the non-usage rule, General Order (G.O.) 153-A Section 5.7).[1]

Later in R.18-03-011, the Commission adopted D.19-08-025, which established a permanent emergency disaster relief program for customers of communications service providers. The emergency disaster relief program becomes applicable when the governor of California or the president of the United States declares a state of emergency for a disaster that results in utility

[1] Decision (D.) 18-08-004 at 9.

service loss or disruption, or the degradation of the quality of utility service.[2] While D.19-08-025 broadened the relief applicable to communications service customers during disasters adopted in D.18-08-004,[3] it did not include any permanent disaster relief protections specific to the LifeLine Program.[4] R.18-03-011 closed without the Commission adopting permanent disaster relief protections for LifeLine customers.[5] The Commission has addressed emergency protections for LifeLine customers via assigned Commissioner rulings on an ad hoc basis since R.18-03-011 closed.[6]

1.2. Background on the Federal Revocation of California's Ability to Streamline LifeLine Application and Renewal Processes

On November 20, 2025, the Federal Communications Commission (FCC) Wireline Competition Bureau issued an Order titled, *In the Matter of Lifeline and Link Up Reform and Modernization* (FCC Order or Order).[7] By its Order, the FCC revoked the exemption that enabled California to opt out of the use of the National Lifeline Accountability Database (NLAD) for the federal Lifeline

---

[2] D.19-08-025 at 2.

[3] *See* D.19-08-025 at 3-4 ("those protections [established in Res. M-4833 and Res. M-4835 and affirmed in D.18-08-004] were narrower than what we are considering here…[.]").

[4] D.19-08-025 at 5.

[5] The Utility Reform Network (TURN) timely filed an application for rehearing of D.25-04-006, which closed R.18-03-011. TURN's rehearing application contended that D.25-04-006 was unlawful because, among other reasons, the Commission did not resolve the scoped issue of whether to adopt permanent disaster relief protections for LifeLine customers. Addressing TURN's application, the Commission clarified that it would be best to address adoption of permanent protections for LifeLine customers in the LifeLine proceeding. (D.25-08-26 at Ordering Paragraph (OP) 1(b).)

[6] *See* the Order Instituting Rulemaking (OIR), R.25-11-005 at 4.

[7] In the Matter of Lifeline and Link Up Reform and Modernization at ¶ 1, WC Docket No. 11-42, DA 25-965 (Nov. 20, 2025), *available at* https://docs.fcc.gov/public/attachments/DA-25-965A1.pdf (FCC Lifeline Order).

program. The Order also adjusted the federal Lifeline National Eligibility Verifier (National Verifier) processes in California to end the use of state eligibility results for enrollment in federal Lifeline.

The NLAD and National Verifier are integrated components of a single electronic system that the federal Lifeline administrator, the Universal Service Administrative Company (USAC), uses to: (1) prevent authorization of more than one Lifeline discount per eligible individual and household; and (2) verify applicant eligibility.[8] Before the Order went into effect, California LifeLine's Third-Party Administrator (TPA) performed these functions. Thus, the Order resulted in significant changes to the enrollment and renewals processes for California LifeLine participants and providers.

Practically speaking, before the Order went into effect, Californians could submit one application through an authorized LifeLine service provider or their agent (often referred to as "street teams"), who then forward the completed application to the TPA. Using the information provided, the TPA verified the applicant's eligibility for California LifeLine and federal Lifeline at the same time. This streamlined application and annual renewal processes. For example, because the TPA made eligibility determinations for both the state and federal programs, an approved applicant's date of enrollment was the same for state and federal programs, decreasing confusion when it came time for the approved applicant to submit information to recertify their eligibility for each program the following year. The applicant could, again, submit the information once to the TPA and recertify for each program simultaneously.

[8] FCC Lifeline Order at ¶¶ 3-4.

The FCC Order became effective on February 1, 2026.[9] Since that date, applicants have been required to separately submit a state application and a federal application to the TPA and USAC, respectively, to qualify for the maximum Lifeline subsidy available. As explained further below, California LifeLine providers have indicated that the Order has caused confusion over the application process, is likely to cause confusion surrounding the annual renewals process, and has raised other questions and concerns.

1.3. Procedural Background

The Commission adopted the order initiating this rulemaking (OIR) on November 21, 2025. The OIR included a preliminary scope of issues that included consideration of permanent procedures for providing disaster relief to California LifeLine participants.

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates), the Independent Small Local Exchange Carriers (Independent Small LECs),[10] The Utility Reform Network (TURN), Neighborhood Legal Services of California (NLSLA), Center for Accessible Technology (CforAT), Verizon Value, Inc. (Verizon), the National Lifeline Association (NaLA) and its participating members in California (jointly, NaLA),[11] Assurance Wireless USA, L.P. (Assurance), Ameelio, Inc. (Ameelio), and CTIA filed opening comments in

[9] FCC Lifeline Order at ¶ 15.

[10] The Independent small local exchange carriers (Small LECs) are Calaveras Telephone Company, Cal-Ore Telephone Company, Ducor Telephone Company, Foresthill Telephone Company, Kerman Telephone Company, Pinnacles Telephone Company, The Ponderosa Telephone Company, Sierra Telephone Company, Inc., The Siskiyou Telephone Company, and Volcano Telephone Company.

[11] The National Lifeline Association's participating members in California are Boomerang Wireless, LLC, AmeriMex Communications Corp. d/b/a SafetyNet Wireless, American Broadband & Telecommunications Company, i-wireless, LLC, and TruConnect Communications, Inc.

response to the OIR on January 26, 2026. NaLA, the California Broadband & Video Association (CalBroadband), Pacific Bell Telephone Company d/b/a AT&T California (AT&T), TURN, CforAT, the Independent Small LECs, CTIA, and Verizon filed reply comments on February 26, 2026.

The assigned Commissioner issued a Scoping Memo and Ruling (scoping memo) on March 24, 2026. On the same date, the assigned Administrative Law Judge (ALJ) issued a ruling requesting additional comments on permanent disaster relief mechanisms (March Ruling). The March Ruling also requested comments on potential Program changes or other actions the Commission could take to address customer confusion or other impacts of the FCC Order. Verizon, CTIA, Assurance, CforAT, NaLA, TURN, Cal Advocates, AT&T, Air Voice Wireless, LLC d/b/a AirTalk Wireless (AirVoice), and the Small LECs[12] filed opening comments in response to the March Ruling on April 14, 2026. Assurance, Verizon, CforAT, the Small LECs, CTIA, TURN, NaLA, and AT&T filed reply comments on April 21, 2026.

1.4. Submission Date

This matter was submitted on April 21, 2026, upon submission of reply comments on the March Ruling.

2. Issues Before the Commission

The issues from the scoping memo to be resolved or otherwise addressed in this decision are Issue 2, Issue 5, and Issue 6:

2. Should the Commission modify Program rules and/or issue guidance to respond to relevant changes in federal policy and the federal Lifeline program and if so, how?

[12] The Small LECs include the Independent Small LECs and Winterhaven Telephone Company, Hornitos Telephone Company, and Happy Valley Telephone Company.

5. Should the Commission adopt permanent procedures for providing disaster relief to California LifeLine participants and, if so, what measures should the Commission adopt?
6. Should the Commission adopt changes to G.O. 153-A to reflect changes made through decisions issued in this proceeding, to reflect changes made in prior proceedings that have not been captured in prior updates, and to incorporate changes in technology, legislation, policies, and other developments?

3. Permanent Disaster Relief Protections for California LifeLine Participants

As the Commission stated in D.18-08-004, there is a need for Commission consideration of disaster preparedness and disaster relief as California experiences the harsh effects of climate change, which increases the probability and severity of disasters like wildfires.[13] In D.19-08-025 the Commission noted that, after 2017, California experienced another record-breaking fire season in 2018, burning close to 2,000,000 acres throughout the state.[14] Since that time, California's record for acres burned in a single fire season more than doubled when, in 2020, over 4,000,000 acres burned.[15] As the probability and severity of disasters like wildfires continues, it is reasonable for the Commission to consider permanent disaster relief protections for LifeLine participants.

In the March Ruling, the assigned ALJ asked parties to respond to the following questions prompted by comments responding to the OIR:

---

[13] D.18-08-004 at 3.

[14] D.19-08-025 at 8.

[15] California Department of Forestry and Fire Protection (CalFire), 2020 Wildfire Activity Statistics at 1. CalFire Wildfire Activity Statistics documents (Redbooks), *available at* https://www.fire.ca.gov/our-impact/statistics.

1. Which, if any, specific aspects of the requirements of D.18-08-004 that relate to the California LifeLine Program should the Commission adopt on a permanent basis?
2. If there are aspects of D.18-08-004 that the Commission should adopt on a permanent basis but that the Commission should modify or clarify due to changes in technology or technology usage, changes to the LifeLine Program, or for any other reason, what modifications should the Commission make?
3. As noted by TURN in comments on the OIR, the federal government occasionally will waive Lifeline eligibility criteria to permit households to enroll in federal Lifeline if such households are receiving individual assistance from the Federal Emergency Management Agency's (FEMA) Individuals and Household Program (IHP). Should the Commission consider a parallel mechanism whereby enrollment in a disaster relief program would allow for automatic enrollment in California LifeLine without demonstration of eligibility on any other basis?
4. If the answer to question 3 is "yes," what disaster relief programs should qualify as a basis for eligibility in California LifeLine?
5. If the answer to question 3 is "yes," how should the TPA verify that those applying to California LifeLine pursuant to this mechanism are receiving the eligible disaster relief subsidies?
6. If the answer to question 3 is "yes," what other Program modifications should the Commission consider to implement such a mechanism (*e.g.*, duration of automatic eligibility, *etc.*)?
7. Are there additional measures the Commission should consider to ensure California LifeLine participants retain service during disasters?

Parties' responses to the OIR and to the questions noted above, as well as the Commission's existing emergency disaster relief program for communications service providers, inform our discussion below.

3.1. Permanent Adoption and Geographic Scope of Protections for LifeLine Customers

As an initial matter, this decision addresses whether permanent disaster relief protections for LifeLine participants are necessary, as opposed to the continuation of ad hoc responses.

3.1.1. Party Positions

Certain LifeLine providers and provider representatives dispute the need for permanent disaster relief protections. While some of these parties do not oppose temporary waiver of certain LifeLine rules,[16] they state that ad hoc responses to disasters make more sense than permanent procedures because disasters can vary based on severity, geography, and duration.[17] For example, Assurance states that some emergencies may warrant no particular relief for LifeLine customers, or, where relief is appropriate, the appropriate duration may vary.[18] Assurance, CTIA, NaLA, and Verizon argue that adopting permanent disaster relief protections could conflict with the federal government's disaster response, causing additional confusion and complexity.[19]

---

[16] *See, e.g.,* Assurance Wireless USA, L.P.'s (Assurance) Opening Comments on the OIR at 7. *See also* Verizon Value, Inc. (Verizon) Opening Comments on the March Ruling at 12.

[17] Assurance Opening Comments on the OIR at 7. *See also* National LifeLine Association, *et al.* (NaLA) Opening Comments on the March Ruling at 5.

[18] Assurance Opening Comments on the March Ruling at 13.

[19] CTIA Opening Comments on the March Ruling at 6. Assurance Opening Comments on the March Ruling at 13. *See also* Verizon Opening Comments on the March Ruling at 12. *See also* NaLA Opening Comments on the March Ruling at 5-6.

CforAT, TURN, Cal Advocates, NLSLA, and the Small LECs support the adoption of permanent disaster relief protections. CforAT supports the permanent adoption of all LifeLine-specific measures affirmed in D.18-08-004.[20] CforAT notes that an ad hoc response methodology leaves customers with no certainty as to support or service availability when disaster strikes, which could be particularly harmful for CforAT's constituency of people with disabilities and medical needs.[21]

TURN supports permanent disaster relief protections, arguing that ad hoc responses could result in delays. Specifically, TURN notes that it took the Commission two weeks longer than the federal government to suspend renewal requirements in the wake of the January 2025 Los Angeles fires.[22] The Small LECs support adoption of clearer, predictable disaster relief measures, subject to reasonable limits, rather than the current practice of ad hoc responses.[23] AT&T states that the Commission should establish clear parameters while preserving flexibility, and states that before adopting any decision, the Commission should perform a fiscal analysis of the impacts of adopting permanent disaster relief protections pursuant to Public Utilities (Pub. Util.) Code Section 321.1.[24]

---

[20] Center for Accessible Technology (CforAT) Opening Comments on the March Ruling at 8.

[21] CforAT Reply Comments on the March Ruling at 5-6.

[22] TURN Reply Comments on the March Ruling at 7. *See also* Neighborhood Legal Services of Los Angeles County (NLSLA) Opening Comments on the OIR at 5. *See also* Public Advocates Office at the California Public Utilities Commission (Cal Advocates) Opening Comments on the March Ruling at 8.

[23] The Small LECs Opening Comments on the March Ruling at 13-14.

[24] *See* Pacific Bell Telephone Company d/b/a AT&T California (AT&T) Reply Comments on the March Ruling at 13. Pub. Util. Code Section 321.1 reads: Evaluation of economic development consequences of commission activities

Footnote continued on next page.

Responding to providers' recommendation that the Commission match its waiver of LifeLine rules to a federal waiver of Lifeline rules, TURN cautions against strict alignment. TURN notes that there may be circumstances in which the FCC might not waive Lifeline rules when it would make sense for the Commission to do so. TURN also notes that by conditioning state action on federal action, the Commission would yield to the federal government the flexibility the ad hoc approach would ostensibly preserve.[25]

3.1.2. Adoption of Permanent Protections

We agree with TURN, CforAT, Cal Advocates, NLSLA, and the Small LECs that it is reasonable to adopt permanent disaster relief mechanisms to quickly protect LifeLine customers from loss of service in the event of a disaster, to ensure customers that they can rely on continuity of access to discounted service, and to provide greater certainty to providers of a minimum level of Commission expectations. As discussed further below, implementation of these measures will be limited to situations of specific severity and delineated geography. We find that the risks of delay and uncertainty that would accompany continuing to address emergencies on an ad hoc basis and the

---

> (a) It is the intent of the Legislature that the commission assess the consequences of its decisions, including economic effects, and assess and mitigate the impacts of its decision on customer, public, and employee safety, as part of each ratemaking, rulemaking, or other proceeding, and that this be accomplished using existing resources and within existing commission structures. The commission shall not establish a separate office or department for the purpose of evaluating and mitigating consequences of commission activities.
>
> (b) The commission shall take all necessary and appropriate actions to assess the economic effects of its decisions and to assess and mitigate the impacts of its decisions on customer, public, and employee safety.

[25] TURN Reply Comments on the March Ruling at 7, citing Verizon Opening Comments on the March Ruling at 11.

attendant impacts on LifeLine participants outweigh the risks of inflexibility or that protections will be overbroad and waste program funds given the scope of a disaster.

As described below, we adopt an approach for disaster related customer protections that provides tailored support for LifeLine customers impacted by disasters by closely aligning protections with the geographic area and duration of the impacts of a declared emergency. We agree with TURN that, when it comes to protecting low-income Californians in emergencies, it is reasonable not to have such protections contingent on the willingness of the federal government to act.[26] Therefore, we find good cause to take the California LifeLine Program's rules out of alignment with the federal Lifeline program. Offering greater protection to low-income Californians via adoption of automatic protections is a reasonable basis for the potential for divergence from federal policy, particularly as the Legislature has stated that increasing access to public resources that enhance public health and safety is an intended benefit of the Moore Act and LifeLine services.[27]

We also agree with providers that we should maintain flexibility. As described in section 5 below, we formalize the mechanism that allows the Commission to temporarily waive or suspend G.O. 153-A provisions. For example, the Commission may waive or suspend G.O. 153-A to implement protections when an emergency does not trigger automatic protections adopted

[26] TURN Reply Comments on the March Ruling at 8.

[27] *See* Pub. Util. Code § 871.7(c)(3).

here, or when extended protections beyond the minimum duration discussed below are warranted.[28]

3.1.3. Geographic Scope of Protections

Pub. Util. Code Section 321.1 requires the Commission to "take all necessary and appropriate actions to assess the economic effects of its decisions […] and mitigate the impacts of its decisions on customer, public, and employee safety […]." The automatic suspension of the non-usage rule and renewal requirements, discussed below, could reduce the number of LifeLine subscribers who are de-enrolled from the Program for failure to recertify eligibility through the annual renewal process, as well as for extended non-usage of their LifeLine service when a declared disaster or emergency occurs. As a result, these measures could increase Program costs and may necessitate an increase in the LifeLine surcharge.

While the Commission has previously adopted disaster protections on a county-wide basis, it is necessary to tailor disaster relief measures to specific zip codes for California's most populous counties to avoid providing subsidy support to customers residing far outside the affected disaster area who would normally be removed from the Program for ineligibility.

We therefore tailor the geographic applicability of the LifeLine Program disaster relief measures when a disaster occurs within the state's ten most populous counties.[29] In these counties, these measures will be limited to customers residing in the zip codes impacted directly by and bordering the

---

[28] *See* Verizon Reply Comments on March Ruling at 6, expressing concern that permanent measures may leave subscribers disconnected if they expire before conditions return to normal.

[29] The ten most populous counties in California each have a population over one million: Los Angeles; San Diego; Orange; Riverside; San Bernardino; Santa Clara; Alameda; Sacramento; Contra Costa; and Fresno Counties.

disaster area. To the extent providers are unclear as to the specific zip codes for which the protections have taken effect, LifeLine service providers may request clarification from Communications Division staff. When necessary, the Communications Division Director will issue an administrative letter clarifying the specific zip codes for which the disaster relief measures are in effect. LifeLine Administrative letters are issued to LifeLine service providers and members of the LifeLine service lists; these letters are also posted to the Commission's website.[30]

To ensure the Commission has the data needed to assess the actual impacts of these emergency protections on the Fund from which providers are reimbursed for providing LifeLine service (LifeLine Fund). The Commission will require California LifeLine service providers to report to the California LifeLine Program the number of customers to whom providers would have issued a non-usage notice under G.O. 153-A Section 5.7.2 during a declared emergency, but for implementation of disaster relief protections.[31] For each declared emergency, the TPA will track the number of renewal notices that it did not issue due to and during the declared emergency, the number of renewal notices ultimately issued to customers for whom renewal notices were deferred, and the renewal rate for deferred renewals.

The purpose of a subsidy program like California LifeLine is to assist Californians in need. To that end, we do not find the potential need to increase

[30] *See* California Public Utilities Commission website, "Administrative Letters," Administrative Letters, (last visited July 20, 2026).

[31] *See* D.19-08-025 at OP 7 (requiring providers to submit an advice letter following implementation of that decision's protections, detailing, among other items, the estimated impacts of the protections such as the number of consumers that received each of the available protections over the 12 months those protections must be in effect).

the surcharge to implement these measures an impediment to the adoption of this decision, and we anticipate the impact to be substantially mitigated by tailoring the duration and scope of the protections. We find that these measures will ensure communications service continuity for the most vulnerable Californians during emergencies, having a positive impact on public and customer safety.

3.2. Decision 18-08-004's Automatic Protections for LifeLine Customers and Additional Recommendations

CforAT, Cal Advocates, NLSLA, Small LECs, and TURN support permanent adoption of the protections first implemented by Res. M-4833 and Res. M-4835, and affirmed by D.18-08-004 — suspension of the annual LifeLine renewal process requirements and suspension of the non-usage rule.[32] For example, Cal Advocates notes that the delay of the renewal requirements prevents customers from being removed from LifeLine due to missed deadlines caused by displacement, loss of documents, or lack of access to mail or the internet following emergencies. Cal Advocates further notes that suspension of the non-usage rule will protect customers from service deactivation should they lose access to a phone connected to their LifeLine service discount for an extended period due to, for example, evacuation.[33]

While, as noted above, certain providers and representatives oppose any permanent disaster relief protections because of their permanency, no commenter provided specific opposition to the substance of the D.18-08-004

[32] TURN Opening Comments on the March Ruling at 12. CforAT Opening Comments on the March Ruling at 8. Small LECs Opening Comments on the March Ruling at 14. NLSLA Opening Comments on the OIR at 5-6.

[33] Cal Advocates Opening Comments on the March Ruling at 8.

protections. We find them reasonable and adopt them as permanent disaster relief protections for California LifeLine participants.

While the TPA can adjust Program administration to implement these protections, these adjustments will take time. The TPA will inform Communications Division staff when it is ready to begin implementation. It is reasonable for the emergency disaster relief required by this decision to become effective upon issuance of an administrative letter by the Communications Division director to California LifeLine service providers and the service list of this rulemaking confirming the TPA's readiness to process these changes.

3.2.1. Customer Outreach and Additional Recommendations

CforAT, TURN, and Cal Advocates suggest the Commission adopt outreach and education requirements to ensure customers are aware of emergency disaster protections. Cal Advocates and TURN also recommend additional permanent disaster relief protections beyond those found in Res. M-4833 and Res. M-4835 as discussed below.

CforAT states that the Commission should look to the education and outreach requirements in D.19-08-025 to require meaningful customer outreach, education, and assistance regarding California LifeLine-specific protections.[34] D.19-08-025's outreach requirements apply to the customers of all facilities-based and non-facilities-based landline and wireless communications providers in disaster-impacted areas. That decision required communications service providers to file a Tier 1 advice letter setting forth a plan for customer outreach and to inform customers of the decision's protections in a number of languages

[34] CforAT Opening Comments on the March Ruling at 9.

and accessible formats for customers with disabilities impacting their ability to use standard forms of communication.[35]

It is reasonable to require LifeLine service providers to update these outreach plans via Tier 1 advice letters to include information on how they will inform impacted customers of the availability of LifeLine and of the available customer protections before and during a disaster within 60 days of the effective date of this decision. Consistent with D.19-08-025, the outreach must be provided in English, Spanish, Chinese (including Cantonese and Mandarin), Tagalog, and Vietnamese, as well as Korean and Russian where those languages are prevalent, and in accessible formats.

D.19-08-025's Conclusion of Law 48 lists communication mediums providers should employ to educate customers on emergency relief, but it does not require use of a specific medium. We grant the same flexibility in modes of outreach here. Providers are reminded that new LifeLine marketing and outreach materials must be submitted to the Commission for review pursuant to G.O. 153-A Section 7.10. We require submission of these materials via Tier 2 advice letter within 45 days of the effective date of this decision. We note that customer education materials should inform customers, per section 4 of this decision, below, that waiver of California LifeLine rules does not impact the applicability of federal Lifeline rules, and that customers may still be required to comply with federal non-usage and renewal requirements to retain federal Lifeline eligibility.

TURN recommends that facilities-based and non-facilities based wireless providers who participate in California LifeLine should be required to conduct

---

[35] D.19-08-025 at OP 8. *See also* Cal Advocates Opening Comments on the March Ruling at 9 (supporting submission of a Tier 1 advice letter to establish compliance).

outreach by deploying employees to shelters who can assist disaster survivors in applying for California LifeLine. TURN suggests that these requirements are analogous to D.19-08-025's requirements that wireless providers make temporarily available mobile phones for customers seeking shelter from a disaster, and more that facilities-based wireless providers provide device charging stations and Wi-Fi access in areas where impacted wireless customers seek refuge from fires."[36]

TURN also notes that 2-1-1 services can be used to provide information on LifeLine. TURN recommends that the Commission require reporting on what actions providers have taken to increase awareness of 2-1-1 pursuant to D.19-08-025. TURN also urges the Commission to consider whether to require providers to notify customers in areas affected by disasters about the services 2-1-1 can provide.[37]

At this time, we do not have the record to support the reasonableness of requiring LifeLine providers to staff shelters with employees to assist with program enrollment, particularly when on-the-ground conditions may change quickly or when local staff may themselves be impacted by the declared emergency. While TURN states that "these providers are already required to provide service and resources to shelters,"[38] it is not clear that the resources providers are currently required to make available to shelters rise to the level of requiring staff be stationed onsite to assist in LifeLine enrollment. D.19-08-025 lists positioning trained staff at local assistance centers as one communication

---

[36] TURN Opening Comments on the March Ruling at 12-13.

[37] TURN Opening Comments on the March Ruling at 13-14.

[38] TURN Opening Comments on the March Ruling at 13.

measure among many that landline and wireless providers have the flexibility to use where and when appropriate.[39] We decline to go further than that decision.

We do, however, agree with TURN that 2-1-1 is a valuable source of information regarding the availability of LifeLine service and other disaster-related information. As noted in D.19-08-025, 2-1-1 service plays a critical role in providing information in times of disaster and assists residents of affected areas in accessing information about evacuation, shelter, food, and medical and recovery services.[40] We therefore require LifeLine service providers to engage with 2-1-1 service providers, to the extent that they have not done so already, and provide them with customer service phone numbers and direct links to their LifeLine websites to ensure that individuals in disaster situations are informed of the availability of LifeLine service and are able to quickly access enrollment information.[41] Because general awareness of 2-1-1 service and related wireline and wireless provider responsibilities are governed by D.19-08-025, we decline to adopt additional responsibilities in that area recommended by TURN.

Cal Advocates recommends that the Commission require LifeLine providers to waive service related fees during an emergency, "*e.g.*, activation fees, installation fees, and reconnection fees."[42] D.19-08-025 already requires landline providers to waive service activation fees for customers who relocate

---

[39] D.19-08-025 at Conclusion of Law (CoL) 48.

[40] D.19-08-025 at 26.

[41] *See* California Public Utilities Commission website, "2-1-1 Information Services," for information, including information on 2-1-1 service providers in California, *available at* https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/211-information-services.

[42] Cal Advocates Opening Comments on the March Ruling at 8 (citing D.18-08-004 at 8-9). *See also* CforAT Reply Comments on the March Ruling at 6 (supporting Cal Advocates' recommendation).

after a disaster.[43] However, D.19-08-025 does not have a similar requirement for wireless providers. It is possible that a disaster may cause a wireless LifeLine participant to change service providers. For example, participants may need to change if their current service provider's service is unavailable or unreliable in the area to which the participant has relocated following a disaster.

We agree with Cal Advocates that the need to pay a service activation fee out of pocket following a disaster could be particularly harmful for a LifeLine participant recovering from a disaster. To ensure LifeLine participants impacted by disasters do not lose LifeLine service, we require wireless LifeLine providers to offer service activation/connection and service conversion at no cost to impacted LifeLine customers for the duration of the emergency measures set forth in this decision. Service connection reimbursements provided during disasters count toward the annual per-customer limit under Program rules, and providers may seek reimbursement only up to that limit. If an affected customer has already reached their annual limit, the provider must provide the connection at no cost to the customer and at no cost to the LifeLine Fund. This requirement is consistent with D.19-08-025's requirement that landline providers waive certain fees for customers during disasters, including waiver of service charges for installation of service at a customer's temporary or new permanent location and return location.[44]

3.3. Timing and Duration of LifeLine Customer Protections

Disaster relief protections should have clear activation criteria and minimum durations to provide certainty for Program providers and participants.

---

[43] D.19-08-025 at OP 3.

[44] D.19-08-025 at OP 3.

Cal Advocates recommends adopting protections activated upon a governor-declared state of emergency "or other official disaster declaration applicable to the affected area."[45] The Small LECs state that it would be more practical for a state or federal declaration of a state of emergency to activate relief measures than a list of disaster types.[46]

The customer protections adopted in D.19-08-025 are activated by an emergency declaration by the governor of California or president of the United States, where the disaster has caused: (1) a disruption of the delivery or receipt of utility service; and/or (2) the degradation of the quality of the utility service to residential and small business customers. The Commission reasoned that using an emergency declaration "will minimize confusion and set a clear precedent on how and when the emergency disaster relief program is activated."[47] Additionally, the customer relief protections in D.19-08-025 that provide fee or rate relief are dependent on utility outages or degradation reaching a 24-hour threshold.[48]

We here adopt D.19-08-025's activation criteria for implementation of LifeLine consumer protections following a disaster. This consistency with existing emergency disaster relief protection requirements can decrease confusion and increase certainty for providers and customers. Using a threshold specific to emergencies that cause utility service disruption or degradation, as defined in D.19-08-025, with a 24-hour threshold, ensures that activating

[45] Cal Advocates Opening Comments on the March Ruling at 10.

[46] Small LECs Opening Comments on the March Ruling at 14.

[47] D.19-08-025 at 23.

[48] D.19-08-025 at CoL 34.

emergencies have a certain level of severity and connection to utility service, as recommended by provider commenters.

Res. M-4833 and Res. M-4835 adopted the waivers of the non-usage rule and renewal requirements for four months.[49] D.18-08-004 held that those protections would be in force on an interim basis for the same duration adopted in Res. M-4833 and Res. M-4835 or until utility service is restored.[50]

TURN recommends that the Commission adopt a six-month waiver duration, which TURN states is consistent with the duration for federal emergency communication support.[51] If the Commission declines to parallel the federal window, TURN supports a four-month duration, consistent with Res. M-4833 and Res. M-4835. The Small LECs note that "while it seems logical to lift disaster relief measures as soon as the triggering state of emergency has ended," they also support making the relief available for a reasonable amount of time after the emergency has ended. Overall, the Small LECs state the Commission should "prioritize developing clear guidelines for when permanent relief measures [go] into effect, and when they are lifted."[52] Cal Advocates recommends defined durations of 6-12 months or that protections should remain in effect "for the duration of an emergency and continue for a reasonable recovery period thereafter […]."[53]

We agree with commenters that automatic implementation of the rule waivers should have clear, pre-defined minimum durations. Officially,

---

[49] Res. M-4833 at 5 and Res. M-4835 at 9.

[50] D.18-08-004 at CoL 2.

[51] TURN Opening Comments on the March Ruling at 12 (citing 47 C.F.R. § 54.405(e)(6)).

[52] Small LECs Opening Comments on the March Ruling at 14.

[53] Cal Advocates Opening Comments on the March Ruling at 10.

governor-declared states of emergency are to be terminated at the "earliest possible date that conditions warrant."[54] However, in practice, the Legislative Analyst's Office found that successive administrations terminated multiple states of emergency in batches (in one case over 100 at a time), frequently terminating declarations made years earlier by prior administrations.[55] This suggests that official terminations of state emergencies may have little to do with on the ground emergency conditions, and Californians have little certainty as to when declared states of emergency may be terminated. Federal declarations of emergency expire after one year, unless terminated by Congress or extended by the president, again, offering little certainty to providers and customers as to the potential duration of emergency protections.[56]

We adopt an automatic duration for disaster relief protection of one month. To the extent that utility service is still disrupted and/or any related evacuation/shelter in place restrictions, as noticed by the applicable state agency, are still in place at the end of the 30-day period, the consumer protections will be automatically extended for an additional 30 days from the date that service is restored, and evacuation or shelter-in place orders are lifted. To the extent providers are unclear as to the specific end date of the protections, they may request California LifeLine Program staff confirmation. The Communications Division then will issue an administrative letter to LifeLine service providers and LifeLine service lists, clarifying the date to which the disaster protections have

[54] Gov. Code § 8629.

[55] California Legislative Analyst's Office, "Improving Legislative Oversight of Emergency Authorities," at 11, April 10, 2025, *available at* https://lao.ca.gov/reports/2025/5029/Improving-Legislative-Oversight-of-Emergency-Authorities-041025.pdf.

[56] *See* 50 U.S.C. § 1622.

been extended. Administrative letters are also posted to the Commission's website.

A 30-day protection duration allows those impacted by disasters to recover or locate new copies of documents necessary to re-establish LifeLine eligibility or to replace a lost device. This duration balances the need for customer protections following a disaster with the purpose of the LifeLine provisions subject to the waivers: fraud prevention.

The 30-day waiver of the non-usage rule starts the "clock" for any 30-day period of non-usage at 30 days following the declaration of emergency. A participant will have to have failed to use a LifeLine service to which the non-usage rules apply for 30 days following expiration of emergency protections before their provider is required to send notice informing the subscriber of the risk of removal from LifeLine service for non-usage under G.O. 153-A Section 5.7.2.

As applied to the waiver of the renewal process requirements, the expiration of the emergency protections will mark the beginning of a "catch-up renewal process," as described in Res. M-4835. The TPA will administer the catch-up renewal process beginning on the date the emergency protections expire. When Program operations allow, impacted participants' LifeLine anniversary dates will be 75 days following the first date of the catch-up renewal process, consistent with the framework created by Res. M-4853.[57]

Conditions may sometimes warrant extended relief when the automatic protections adopted by this decision are not activated. Currently, the Commission may revise G.O. 153-A provisions by Commission resolution

---

[57] Res. M-4853 at 9-10.

pursuant to G.O. 153-A Section 15. As described in section 5, below, this decision modifies G.O. 153-A to also allow the Commission to temporarily waive or suspend General Order provisions via a staff resolution and, in pre-defined circumstances discussed below, upon action by the Executive Director. This formalizes a mechanism by which the Commission can authorize relief when the automatic protections adopted by this decision are not activated.

3.4. Default LifeLine Eligibility Based on Enrollment in Other Disaster Relief Programs

TURN recommends that the Commission waive LifeLine enrollment criteria during a declared disaster when an applicant can demonstrate that they receive support from a disaster relief program, such as the FEMA's IHP. According to TURN, the federal government implements similar waivers when disasters strike and automatically checks to verify eligibility twelve months after the disaster has ended, de-enrolling any ineligible subscribers.[58] Cal Advocates states that TURN's proposal would remove barriers for those who are not yet LifeLine subscribers and who may have lost access to documents necessary to establish eligibility.[59]

The Small LECs generally support such a mechanism, though they note that there should be ease of verification for the TPA, minimal burdens for customers, and consistent guidelines of duration for all permanent disaster relief mechanisms.[60] CforAT also supports automatic eligibility for LifeLine for those receiving other disaster-related relief.[61]

---

[58] TURN Opening Comments on the OIR at 15-16.

[59] Cal Advocates Opening Comments on the March Ruling at 11.

[60] Small LECs Opening Comments on the March Ruling at 15-16.

[61] CforAT Opening Comments on the March Ruling at 9.

CTIA states that an expanded eligibility provision encompassing those receiving disaster relief could sometimes be appropriate, but recommends the Commission continue to address such situations on an ad hoc basis, in part to avoid additional discrepancies between eligibility requirements in federal and state programs.[62] Among other bases for its opposition to TURN's proposal, Assurance states that receipt of emergency relief does not seem like a logical way to grant LifeLine eligibility unless such relief programs are income-based.[63]

We decline to adopt an expanded LifeLine eligibility framework encompassing those receiving different types of disaster relief. It is inconsistent with the Moore Act's focus on ensuring communications service access to low-income customers to expand eligibility of the Program to those who may not in fact be low-income Californians.[64] For example, while certain eligibility requirements for FEMA IHP may suggest a recipient would be lower income, establishment of that fact is not required for eligibility.[65]

3.5. Make-Up of Federal Support During a Disaster

In its Opening Comments on the March Ruling, CforAT raised the issue of whether the Commission should replace federal Lifeline subsidies in disaster situations when the FCC fails to waive or delays waiver of the renewal requirements and the non-usage rule.[66] In such situations, a California LifeLine subscriber may continue to be eligible for California LifeLine but may no longer

[62] CTIA Opening Comments on the March Ruling at 6.

[63] Assurance Reply Comments on the March Ruling at 15.

[64] *See* Pub. Util. Code § 871.7(a).

[65] *See* 44 C.F.R. § 206.110.

[66] CforAT Opening Comments on the March Ruling at 10-11.

qualify for a federal Lifeline subsidy due to failure to satisfy one or both of those requirements. The Small LECs also ask for clarity as to what will occur if a subscriber is de-enrolled from the federal program but retains California subsidies during a declared emergency.[67]

We decline to extend the make-up of federal support to cover variations in requirements during declared states of emergency. While we hope that the federal government will extend the same disaster relief that California extends, in practice, waiver of our rules does not impact a customer's ability to comply with federal rules should the federal government not similarly grant a waiver. As noted above, providers should be informing customers of this dynamic in their customer education and outreach material. Providers can send federal renewal reminders and are required to send federal non-usage warnings.[68]

3.6. Implementation

D.19-08-025 requires communications service providers to file a Tier 1 advice letter within 15 days of an applicable governor's or president's state of emergency proclamation, reporting compliance with implementation requirements and outreach activities. These advice letters must state which of the required relief measures the provider has implemented; which of the required relief measures the provider will implement pending an FCC Lifeline waiver; which of the required relief measures do not apply because the provider either does not provide or does not charge for that service; and which relief measures, if any, the provider is offering in addition to the required measures.[69]

---

[67] Small LECs Opening Comments on the March Ruling at 14-15.

[68] *See* 47 C.F.R. § 54.405(e)(3).

[69] D.19-08-025 at OP 2.

We require LifeLine providers to include in these advice letters confirmation they have implemented the disaster relief required by this decision. The advice letters must also include a description of the customer outreach performed to inform affected customers of the availability of LifeLine, as well as to inform LifeLine participants of the protections available to them following the disaster declaration. LifeLine providers are required to submit these advice letters pursuant to declared states of emergency that require the automatic implementation of disaster relief measures, as well as following a disaster relief resolution or Executive Director action, unless stated otherwise by the authorizing instrument.

We reiterate here the requirement that LifeLine providers must also submit a Tier 1 advice letter confirming updates of their emergency communications plans, as described in section 3.2.1, above, and must submit related customer education and outreach materials to the Communications Division in compliance with G.O. 153-A Section 7.10.

4. Federal Policy Changes and California LifeLine

As described above, federal revocation of the exemption that enabled California to opt out of the use of the NLAD and the National Verifier processes has caused confusion for the Commission, the TPA, California LifeLine providers and, likely, California LifeLine participants. The Commission has requested that the FCC reconsider its Order to minimize burdens on Californians and LifeLine service providers.[70]

[70] *See ex parte* letter from Ana Maria Johnson, Deputy Executive Director for Broadband and Communications for the California Public Utilities Commission to Marlene H. Dortch, Secretary of the Federal Communications Commission, FCC, WC Docket No. 11-42 (Dec. 23, 2025), *available at* https://www.fcc.gov/ecfs/document/12230220203788/1.

After the issuance of the FCC Order, the Commission hosted a series of meetings attended by representatives of TPA staff, Commission LifeLine staff, LifeLine service providers, consumer advocates, and other interested parties, including occasionally USAC. Attendees had the opportunity to ask California LifeLine staff and USAC staff questions regarding how the programs would operate going forward. In these meetings, Commission staff stated, and we here affirm, that going forward, California LifeLine and federal Lifeline will operate as two separate programs.[71] These stakeholder meetings continue to occur monthly.

In the March Ruling, we asked parties about the practical impacts of the FCC's Order and whether the change necessitated any LifeLine Program changes, including revisions to G.O. 153-A. The March Ruling posed the following questions:

1. What Program policies should the Commission adopt or modify, or what other actions should the Commission take, to minimize barriers or confusion surrounding the bifurcated enrollment processes for the California LifeLine and federal Lifeline programs?
2. Are there any Commission decisions or provisions of G.O. 153-A that must be modified to address the bifurcation between the California LifeLine and federal Lifeline programs, and if so, which decisions/provisions and how should they be modified?
3. Should the Commission require that, if a provider has sufficient information to determine that an applicant is eligible for both California LifeLine and federal Lifeline, the provider must contact the applicant to request authority to apply to both programs on behalf of the applicant?

[71] *See* CforAT Reply Comments on the OIR at 1-3.

4. Should the Commission continue to make up for the loss of federal support for subscribers that qualify through California-Only eligibility (LIHEAP, TANF/CalWORKs/StanWORKs, and NSLP,[72] *etc.*, *see* G.O. 153-A, Rule 5.1.5.2 and households with income between 136% through 150% of the Federal Poverty Guidelines, *see* Rule 5.1.4.2.2)? Should staff be provided with authority to pause the federal makeup if concerns arise? If so, what trigger(s) should enable staff to pause federal makeup provisions?
5. What additional data should the Commission collect from providers, if any, to ensure: (a) that providers are communicating to customers the information necessary for customers to make informed decisions regarding Program participation; and (b) that providers are continuing to be good stewards of the California LifeLine Program funds?
6. Identify changes made to application and outreach processes following the federal revocation of California's opt-out status. Identify steps taken to align application processes and ease the burden on applicants enrolling and renewing eligibility. Identify challenges, if any.
7. Submit qualitative and/or quantitative data on the impact of federal revocation of California's opt-out status on your participant enrollment processes and activities, including data on how many prospective participants have not been able to successfully enroll in both programs.
8. What Program policies should the Commission adopt or modify to minimize barriers or confusion surrounding the bifurcated renewal processes for the California LifeLine and federal Lifeline programs?

[72] LIHEAP is the Low Income Home Energy Assistance Program. TANF is Temporary Assistance for Needy Families. CalWORKS is California Work Opportunity and Responsibility to Kids, while StanWORKS is the equivalent program administered by Stanislaus County. NSLP is the National School Lunch Program.

9. Are there any additional Program changes, party proposals, or facts the Commission should consider related to changes in federal policy impacting California LifeLine?

Overwhelmingly, LifeLine providers asked for clarity regarding the scope of permissible and intended coordination between the California and federal programs going forward; proposed Program changes and G.O. 153-A modifications were more limited. The sections below consider proposed Program modifications and respond to certain questions asked by parties in comments.

4.1. Applications and Eligibility Determinations for California LifeLine and Federal Lifeline, Related Outreach

The March Ruling requested input on the impact of the FCC's Order on the Program enrollment process, and related Program modifications or guidance the Commission could provide following implementation of the FCC's Order.

4.1.1. Party Positions on Application and Enrollment Issues

A number of commenters recommend that the Commission consider ways to re-integrate federal and state enrollment processes to minimize customer confusion that may result from having to complete two separate-but-similar applications to qualify for the two programs.[73] Some providers note that recent enrollment data already suggests that many applicants may not be completing both applications. [74, 75] However, as Assurance notes, coordinating the enrollment

---

[73] *See, e.g.*, TURN Reply Comments on the March Ruling at 2 (recommending that the Commission adopt federal Lifeline as a program enrollment in which would qualify an applicant for California LifeLine).

[74] Air Voice Wireless, LLC d/b/a AirTalk Wireless (AirVoice) Opening Comments on March Ruling at 1. Verizon Opening Comments on the March Ruling at 2, 9.

[75] *See, e.g.,* Verizon Opening Comments on the March Ruling at 3 (stating: "[t]his oversight or misunderstanding of the recently bifurcated enrollment prevents Californians from maximizing their connectivity with the full support of the programs for which they qualify.").

processes for the California and federal programs is complicated not only by the FCC's Order, but also by the recently enacted Pub. Util. Code Section 876.5. This statute limits the Commission, its TPA, LifeLine providers, and other agents' ability to share applicant and subscriber information with the federal government.[76]

To reintegrate application and enrollment processes, AirVoice, AT&T, and TURN recommend that the Commission create a single application that can be used for both programs or that the Commission allow providers to create a dual enrollment application process.[77] Verizon recommends that the Commission develop application programming interfaces (API) to link the state and federal online applications.[78] CforAT recommends that the Commission create a "prequalification" enrollment process wherein an applicant engages directly with the TPA for an eligibility determination before seeking a provider for service. CforAT acknowledges that this proposal could take time to implement, but suggests this process could incorporate a structure whereby the TPA submits certain information to the National Verifier to allow for dual enrollment.[79]

Verizon, AirVoice, and TURN recommend that the Commission add federal Lifeline to the list of programs that would qualify an applicant for

---

[76] Assurance Opening Comments on the March Ruling at 4-5.

[77] AirVoice Opening Comments on the March Ruling at 2. TURN Opening Comments on the OIR at 3. AT&T Opening Comments on the March Ruling at 2. *But see* TURN Reply Comments on the March Ruling at 2, stating that a coordinated application process could happen "through one form or two," so long as they are presented simultaneously and explained to the applicant.

[78] Verizon Opening Comments on the March Ruling at 3 (recommending Commission development of APIs).

[79] CforAT Opening Comments on the March Ruling at 2.

California LifeLine, which would lower administrative burdens for applicants.[80] Somewhat similarly, the Small LECs recommend that the TPA establish a relationship with USAC to access the federal Lifeline database, in order to base California eligibility determinations on federal eligibility determinations for those customers who apply to federal Lifeline.[81] The Small LECs acknowledge Pub. Util. Code Section 876.5 may make coordinated enrollment processes legally infeasible.[82]

AT&T states that proposals to use an API to link California and federal Lifeline forms, dual discount application options, and submission of information to the National Verifier "appear problematic," given Pub. Util. Code Section 876.5's prohibition on sharing applicant information with the federal government.[83]

NaLA, TURN, and Verizon stress the potential for customers to be denied federal eligibility or to fail to finish the federal application process due to issues solely involving the federal enrollment process. For example, the National Verifier does not have direct access to the CalFresh or MediCal databases the TPA often uses to verify programmatic eligibility.[84] Beyond the burden of filling out two applications, having to provide documents to prove qualifying program enrollment (using USAC's stringent list of acceptable documents) adds barriers

[80] Verizon Opening Comments on the March Ruling at 4-5. AirVoice Opening Comments on the March Ruling at 3-4. TURN Reply Comments on the March Ruling at 2.

[81] Small LECs Opening Comments on the March Ruling at 6.

[82] Small LECs Reply Comments on the March Ruling at 4.

[83] AT&T Reply Comments on the March Ruling at 12.

[84] NaLA Opening Comments on the March Ruling at 3. Verizon Opening Comments on the March Ruling at 4. TURN Opening Comments on the OIR at 5-7.

to the federal process.[85] Verizon urges the Commission to develop or encourage links between USAC and the CalFresh and MediCal databases to decrease these administrative barriers.[86] Additionally, USAC's carrier portal is not available in Spanish, limiting the help some customer service representatives are able to provide, and leaving customers with an "English-only application."[87]

As noted above, the March Ruling asked whether the Commission should require that, if a provider has sufficient information to determine that an applicant is eligible for both California LifeLine and federal Lifeline, the provider should be required to contact the applicant to request authority to apply to both programs on behalf of the applicant.

Providers, for the most part, opposed this proposed requirement. For example, AT&T states that a requirement that a provider ask an applicant whether the provider may submit a federal Lifeline application on the applicant's behalf could come at the risk of fraud if third parties purporting to be LifeLine providers seek applicants' personal information. Without explanation, AT&T also states that such a requirement "appears to be at odds" with Pub. Util. Code Section 876.5(a). Finally, AT&T states that providers have no visibility into whether an applicant has already applied to federal Lifeline and whether their application has been denied.[88] CTIA states that the federal Lifeline rules do not

---

[85] Small LECs Opening Comments on the March Ruling at 6. *See also* Verizon Opening Comments on the March Ruling at n.10.

[86] Verizon Opening Comments on the March Ruling at 2-3.

[87] Small LECs Opening Comments on the March Ruling at 3.

[88] AT&T Opening Comments on the March Ruling at 3-4. *See also* Assurance Opening Comments on the March Ruling at 9 (stating that providers do not have the information or authority to apply to Lifeline on behalf of a subscriber and would have no way of contacting an applicant as the purpose of a Lifeline application is to obtain service).

allow an eligible applicant to authorize a provider to apply to federal Lifeline on their behalf.[89] The Small LECs believe the proposal shifts burdens from customers to providers, and would significantly increase providers' administrative costs, while not resolving the issue of separate application/renewal dates.[90]

Verizon opposes a mandate to follow up with applicants that appear eligible for federal Lifeline to request authority to submit a federal application, because, among other reasons, Verizon argues that the Commission should minimize the need for continued communication between the provider and applicant, which, Verizon states, could cause more confusion.[91]

Diverging from other providers, AirVoice states that the Commission should encourage providers to proactively check subscriber eligibility and enrollment status across programs and, where appropriate, to follow up with applicants to facilitate completion of a second application. AirVoice notes that "[p]roviders are uniquely positioned to identify situations in which a customer has enrolled in only one program despite being potentially eligible for both." AirVoice notes that follow up can occur through automated notification or direct outreach and should be recognized as program related assistance.[92]

CforAT argues that provider receipt of a California subsidy should in fact be conditioned upon a provider's submission of a potentially eligible customer's

---

[89] CTIA Opening Comments on the March Ruling at 3 (citing Emergency Broadband Benefit Program, Report and Order, 36 FCC Rcd 4612, 4638 ¶ 54 (2021)). *See also* Assurance Opening Comments on the March Ruling at 9 (stating providers do not have the authority or information to apply on an applicant's behalf).

[90] Small LECs Opening Comments on the March Ruling at 8.

[91] Verizon Opening Comments on the March Ruling at 6.

[92] AirVoice Opening Comments on the March Ruling at 3.

federal application, if consent is obtained from the customer. CforAT states that, otherwise, providers may lack the incentive to actively pursue the federal subsidy given the generous California subsidy.[93] Assurance objects to CforAT's characterization, stating that assumptions that providers are trying to "game" the system are unfounded.[94] TURN opposes CforAT's recommendation because TURN argues that submitting California LifeLine applicant information to the federal government may violate Pub. Util. Code Section 876.5.[95]

NaLA states that, due to the dual enrollment processes, many applicants will be determined eligible for California LifeLine and not federal Lifeline, including those that are actually eligible for both programs, "which essentially puts them in the same position as applicants that qualify through California-only[[96]] eligibility because those subscribers will not receive the federal Lifeline subsidy of $9.25 per month."[97] For this reason, NaLA suggests the California LifeLine Program must either make up the $9.25 federal subsidy or set a new reduced service tier that contemplates receipt of only the California LifeLine reimbursement.[98] Verizon disagrees with the proposal to extend federal make-up eligibility,[99] but supports recalibration of the minimum service

---

[93] CforAT Opening Comments on the March Ruling at 2-3.

[94] Assurance Reply Comments on the March Ruling at 10-11.

[95] TURN Reply Comments on the OIR at 3-4.

[96] The California LifeLine Program will make up the difference in funding for certain subscribers that do not qualify for federal funding, referred to as "California-Only" subscribers. *See* G.O. 153-A, § 5.1.5.4. Pursuant to D.25-10-033 at OP 3, federal make-up also extends to California LifeLine participants who enroll in the California LifeLine Program without social security numbers consistent with G.O. 153-A.

[97] NaLA Opening Comments on the March Ruling at 2-3.

[98] NaLA Reply Comments on the March Ruling at 2.

[99] Verizon Reply Comments on the March Ruling at 5-6.

standards and specific support amount based on updated figures of California-Only subscriber rates.[100]

4.1.2. Discussion of Application and Enrollment Issues

As noted on the Commission's website, as of February 1, 2026, the California LifeLine and federal Lifeline programs have required separate enrollment processes.[101] The primary changes in functional responsibilities that have occurred to date are that the TPA is no longer responsible for making final federal Lifeline eligibility and enrollment determinations for California applicants or for processing federal Lifeline renewal documents for California subscribers; those responsibilities now lie with USAC. While the Commission continues to advocate for more coordinated application processes with USAC, stakeholders should be aware that there are limitations to the level of integration the Commission can achieve alone and given the constraints set by Pub. Util. Code Section 876.5.

Given the Commission's intention to work towards a state-hosted online California LifeLine enrollment process (Customer Portal 2.0) in 2027, the Commission does not intend to develop an API for use on provider websites at this time. As the only entities with responsibilities as middle persons between applicants and *both* programs, service providers, in consultation with their legal representatives, are currently in the best position to consider ways to improve customer experiences with any dual program enrollment application processes. Service providers must ensure compliance with Pub. Util. Code Section 876.5 and

[100] Verizon Opening Comments on the March Ruling at 7.

[101] California Public Utilities Commission website, "California LifeLine vs. Federal Lifeline," *available at* https://www.cpuc.ca.gov/news-and-updates/all-news/california-lifeline-vs-federal-lifeline (last visited May 12, 2026).

any other relevant state or federal laws. Requirements to implement a dual program enrollment process are provided in section 4.5 of this decision and related customer education requirements are addressed in section 4.1.4.

We agree with commenters that adopting federal Lifeline as a program that would qualify a participant for eligibility in California LifeLine could ease administrative burdens for applicants and for those processing applications and may be the best way to integrate application processes without violating state law. However, currently, the Commission does not receive the timely, verified federal enrollment information it would need to implement this recommendation.

If the Commission gains the ability to receive real-time, verified federal enrollment data in the future, G.O. 153-A authorizes the Commission to amend its list of qualifying assistance programs via staff resolution.

We encourage providers to contact USAC regarding the constraints caused by USAC's list of acceptable documents for establishing federal Lifeline eligibility as well as concerns with language accessibility. We are sympathetic to providers' concerns regarding USAC's responsiveness.[102] The Commission will continue to advocate for California providers and customers with USAC on these issues.

We decline to require California LifeLine service providers to request consent to apply for federal Lifeline on behalf of an applicant that a provider believes may be eligible for federal Lifeline because providers are likely sufficiently incentivized to promote federal Lifeline enrollment. Thus, we need not consider the weight to give the legal and practical arguments made by

[102] *See* Small LECs Opening Comments on the March Ruling at 12.

certain parties narrowly interpreting the proposal.[103] We note that, contrary to many providers' stated position,[104] USAC itself states that providers "submit federal applications on applicants' behalf after obtaining consent."[105] However, applicants must qualify for federal Lifeline or be eligible for California-Only subsidies for providers to continue to receive the maximum subsidies available. Thus, providers are likely sufficiently incentivized to encourage eligible applicants to apply to federal Lifeline.[106] Accordingly, we will not adopt a requirement at this time. We agree with AirVoice that providers are uniquely positioned to identify situations in which a customer has enrolled in only one program despite being potentially eligible for both, and while we will not adopt a requirement that providers initiate outreach with applicants, we adopt customer education requirements described below.

The TPA will continue to review California LifeLine applications to determine whether an applicant qualifies for federal make-up pursuant to G.O. 153-A, which, as noted above, limits federal make-up reimbursement to California-Only customers. To promote LifeLine Fund longevity and ensure the

---

[103] *See, e.g.,* CTIA Reply Comments on the March Ruling at 4. *See also* Verizon Reply Comments on the March Ruling at 4 (suggesting that because providers cannot sign a federal application on behalf of an applicant, providers cannot be required to contact an applicant Verizon has admitted it may already be directly engaging with to request authority to submit a federal application on behalf of the applicant). *See* Verizon at Opening Comments on the OIR at 3-4.

[104] *See, e.g.,* Assurance Opening Comments on the March Ruling at 9 (stating "providers do not have the authority or the information necessary to apply for lifeline on behalf of a subscriber."). *See also*, *supra*, n.92 and n.79.

[105] *See* slide 16 in the National Verifier 101 slide deck presented by USAC at the January 14, 2026, National Verifier 101 webinar. USAC, National Verifier 101 webinar materials, *available at* https://www.usac.org/wp-content/uploads/lifeline/documents/training/2026/Lifeline-January-2026-Monthly-Webinar-National-Verifier-101.pdf. USAC states: "Service providers may submit an online application on the consumer's behalf (with the consumer's consent) using the National Verifier service provider portal."

[106] *See* AT&T Reply Comments on the March Ruling at 2.

TPA's efforts in this regard are successful, staff will continue monitoring federal make-up reimbursement rates for California-Only subscribers.[107] We also adopt additional enrollment reporting requirements below.

We decline to adopt NaLA's proposal to reduce service standards or to offer federal make-up to all customers deemed ineligible for federal Lifeline by the National Verifier but deemed eligible for California LifeLine by the TPA. As stated above, the TPA will continue to assess eligibility for federal make-up based on previously established categories of California-Only customers and using information provided in California applications. No California LifeLine eligibility rules are changed by the FCC Order. To broaden the scope of federal make-up at this time would reduce provider incentives for ensuring the federal program continues to be fully utilized, including by assisting customers in submitting applications that satisfy federal requirements in form, as well as substance. The Commission will consider the enrollment data required below and historical rates of California-Only subscribership when considering specific support amount and minimum service standard annual updates to determine if a change of course is then warranted.

4.1.3. Party Positions on Customer Education and Outreach

In addition to providing recommendations regarding application process improvements, many commenters recommend ways to improve customer education and awareness. For example, Cal Advocates recommends that the

[107] *See* D.14-01-036 at 123 and D.25-10-033 at 30 (directing staff to monitor enrollment levels of California-Only customers). *See also* Cal Advocates Opening Comments on the March Ruling at 1-2; Small LECs Reply Comments on the March Ruling at 3 (advocating for monitoring of the LifeLine Program for budgetary impacts and the potential for pressure on the LifeLine surcharge).

Commission update the California LifeLine website with a standalone webpage to make clear to potential applicants the split between the California LifeLine and federal Lifeline programs and to inform customers of the termination of the unified application process. Cal Advocates also recommends that the Commission require service providers to inform customers via their websites that they will not be automatically enrolled in federal Lifeline by virtue of applying to California LifeLine and that they must separately apply to qualify for both programs. Cal Advocates recommends that customer service representatives for the TPA, for the Customer Affairs Branch, and for service providers be trained to assist applicants to both programs.[108]

TURN also supports coordinated efforts towards customer education on application processes, stating that most of the efforts are likely to fall on the service providers and customer support centers of the TPA and USAC.[109] CforAT recommends G.O. 153-A updates to require customer notice of the program bifurcation.[110]

Many provider and provider representative commenters support coordination of customer education with the Commission taking the lead.[111] Some providers state that they have begun educating customers via website updates and other communications including updated agent enrollment

---

[108] Cal Advocates Opening Comments on the March Ruling at 2-3. *See also* AT&T Opening Comments on the March Ruling at 2 (recommending updates to the California LifeLine website).

[109] TURN Opening Comments on the OIR at 2-3.

[110] CforAT Opening Comments on the March Ruling at 3-4.

[111] AT&T Opening Comments on the March Ruling at 2.

communications.[112] The claims of existing outreach cause certain providers to oppose a related mandate. Assurance, for example, states that it has updated its website and customer agent information, and that an outreach mandate would distract from developing clear and consistent guidance.[113] AT&T states that recommendations that providers include related information in notices that meet Commission guidelines and that the Commission review these materials are "[un]necessary as they would add administrative burden and delay or duplicate functions better handled by the Commission."[114]

4.1.4. Discussion of Customer Education and Outreach Requirements

We agree with commenters that more can be done to ensure the public is educated regarding the impacts of the FCC's Order. Commission staff will update the California LifeLine website to inform customers that California LifeLine is a separate program from federal Lifeline and that applicants now need to complete and submit two applications to enroll in both programs. Consistent with recommendations from AT&T, Cal Advocates, and TURN, this information should be linked from a prominent area on the home webpage, and available on a separate page providing additional information about the divergence of the application process for each program.[115] Staff may update the California LifeLine website with the following language:

> As an effect of the Federal Communications Commission's (FCC) Wireline Competition Bureau's November 20, 2025,

[112] *See, e.g.,* Assurance Reply Comments on the March Ruling at n.16 and at 7-8. AT&T Opening Comments on the March Ruling at 1. *See, e.g.,* Verizon Opening Comments on the March Ruling at 8.

[113] Assurance Reply Comments on the March Ruling at 13.

[114] AT&T Reply Comments on the March Ruling at 7-8.

[115] AT&T Opening Comments on the March Ruling at 2.

> Order, *In the Matter of Lifeline and Link Up Reform and Modernization,* the application and eligibility verification process for California LifeLine and federal Lifeline now operate independently. California LifeLine discounts have not changed, and existing customers do not need to re-enroll. However, as of February 1, 2026, new applicants must submit a separate application for each program to qualify for the maximum, combined subsidy available, unless such applicants apply for both programs with a service provider that has implemented an authorized dual enrollment process.[116] New and existing customers will need to complete the annual renewal process separately for each program to maintain their discounts.
>
> For information on changes to the programs, enrollment, and program offerings please use following links:
>
> - California Public Utilities Commission related information: California LifeLine vs Federal Lifeline
> - California LifeLine (state program home): www.californialifeline.com
> - Federal Lifeline (federal program home): www.lifelinesupport.org

We will also update the California LifeLine application-related webpage information to include a link to information on where eligible customers can apply for the federal Lifeline program and on the potential customer impacts of not applying.[117] Finally, we will require the TPA to update the California LifeLine Application instructions to inform customers that submission of a California LifeLine application does not constitute application for federal Lifeline.[118]

---

[116] Requirements for providers to implement a dual enrollment process are in section 4.5 of this decision.

[117] *See* AT&T Opening Comments on the March Ruling at 2.

[118] *See* Attachment A, G.O. 153-A Revisions at Section 4.4.

We agree with TURN, however, that the Commission is not the primary touchpoint with LifeLine customers.[119] Most customers apply through service providers and their agents,[120] and customers receive monthly bills and customer support from providers. It is likely that customers are far more familiar with their phone service provider than with the Commission. It is imperative that providers have a role in educating customers. We direct California LifeLine service providers to include, at minimum, similar information to that noted above on their websites in an area likely to be viewed by those applying for California LifeLine.

When new residential customers call to establish service, California LifeLine service providers shall also inform them of the separate existence of California LifeLine and federal Lifeline and take appropriate steps to enroll those customers who indicate an interest in federal Lifeline.[121] They will also be required to include related information in application form notices required under G.O. 153-A Section 4.1.3 and in verbal enrollment processes governed by Section 4.2.[122]

If service providers create and use additional application instructions in print or online, beyond the instruction form the TPA creates, service providers are required to inform customers via these instructions that California LifeLine and federal Lifeline are separate programs and applicants must complete the respective enrollment processes for each program to qualify for the maximum,

---

[119] TURN Reply Comments on the March Ruling at 3.

[120] California Public Utilities Commission, California LifeLine Program Assessment & Evaluation at 39 (May 2022), *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M478/K367/478367564.PDF.

[121] *See* CforAT Opening Comments on the March Ruling at 3-4.

[122] *See* Attachment A, G.O. 153-A Revisions.

combined subsidies available. If a provider implements a dual program enrollment process, these instructions should reflect the guidance provided in section 4.5 of this decision. Given their experience marketing to and enrolling customers, providers have the flexibility to develop the text needed to impart this information.[123]

Providers must also update the annual LifeLine notices required by G.O. 153-A Section 4.3 to contain the information noted above. Finally, in addition to updating their websites, annual LifeLine notices, application form notices, application instructions, and enrollment scripts, LifeLine service providers must update their general customer education materials to reflect the program split, where applicable. When a consumer is being educated about program enrollment and renewal changes, written and/or electronic education materials should at minimum indicate where applicants and participants can find additional information about related program impacts on provider websites.

We agree with TURN, Cal Advocates, and CforAT that the Commission should continue to review updated education and marketing materials, as required by G.O. 153-A Section 7.10.[124] Despite many providers stating that they have already updated their websites, we note that, to date, staff reports not having received relevant updated education and marketing material for staff approval pursuant to G.O. 153-A Section 7.10 from any LifeLine service provider.

---

[123] *See, e.g.,* Assurance Reply Comments on the March Ruling at n.16 (citing its webpage language: "Previously you could apply for the California LifeLine and Federal Lifeline programs together. However, the FCC announced that as of Feb 1, 2026, California customers will need to apply for each program separately. Applying for both programs increases your likelihood of being approved for Assurance Wireless and reduces your risk of a break in service.").

[124] Cal Advocates Opening Comments on the March Ruling at 6. TURN Reply Comments on the March Ruling at 4. CforAT Opening Comments on the March Ruling at 6.

While we do not identify specific providers in this decision, we also note that at least some providers have not updated their California LifeLine websites with any related information and their websites still contain misleading information. Ample grounds exist to require providers to update their websites and to submit screenshots of such updates to the Commission.

Pursuant to G.O. 153-A Section 7.10, we require all California LifeLine service providers to submit Tier 2 advice letters providing updated LifeLine consumer education materials to be used to inform customers of the changes to the state and federal Lifeline programs, including scripts used by customer service representatives and screenshots of the required website updates, to the Communications Division for review and approval. These submissions are due within 45 days of the effective date of this decision.

4.2. General Make-Up of Federal Support and Tariff Updates

The March Ruling asked parties to comment on whether the Commission should continue to make up for reduced federal support for California-Only subscribers. The March Ruling further asked parties to comment on whether the Commission should delegate to staff the authority to pause federal make-up provisions if concerns arise. Verizon notes that 98 percent of its California LifeLine subscribers were eligible for both programs prior to February 1, yet since that time, approximately 65 percent of Verizon's new enrollments were only approved for California LifeLine.[125] While this figure does not represent federal make-up claims, there is concern that an uptick in claims for make-up

[125] Verizon Opening Comments on the March Ruling at 9. AirVoice similarly notes that, in February and March 2026, only approximately 55 percent of its applicants were successfully enrolled in and approved for both California LifeLine and federal Lifeline. AirVoice Opening Comments on the March Ruling at 3.

support for California-Only subscribers may result from customers' failure to complete federal applications, rather than differences between federal and state eligibility criteria and service standards that the Program intends to support.

Most commenters support ongoing make-up of federal support for California-Only subscribers, noting that federal make-up continues to support Program affordability and other California priorities.[126] We therefore decline to revise existing federal make-up provisions at this time. However, to be clear, as noted in section 4.1.2 of this decision above, the specific circumstances under which the Commission will make up for a lack of federal support are those detailed in G.O. 153-A. This decision does not extend make-up provisions to additional California LifeLine subscribers who fail to apply for federal Lifeline despite apparent eligibility for that program.[127]

Some commenters oppose allowing staff the authority to pause federal make-up provisions. For example, the Small LECs and AT&T argue that the Commission cannot delegate this authority to staff as it is a determination that requires the exercise of Commission discretion.[128] TURN does not oppose allowing staff to pause federal make-up, but states that the process should be

[126] *See, e.g.,* Verizon Opening Comments on the March Ruling at 7. Cal Advocates Opening Comments on the March Ruling at 5. AirVoice Opening Comments on the March Ruling at 4. Small LECs Opening Comments on the March Ruling at 9. CforAT Opening Comments on the March Ruling at 6. TURN Opening Comments on the March Ruling at 6. NaLA Opening Comments on the March Ruling at 4.

[127] *See* CalBroadband Reply Comments on the OIR at 10-12 (opposing extension of federal make-up to replace any funding lost due to program separation because "replacing federal Lifeline dollars with state funds would risk depleting the California LifeLine Fund, threaten long-term program stability, and potentially require increased surcharges on intrastate communications."). *See also* Verizon Reply Comments on the March Ruling at 5-6 (opposing extension of federal make-up to circumstances beyond existing eligibility requirements).

[128] AT&T Opening Comments on the March Ruling at 5-6. Small LECs Opening Comments on the March Ruling at 10.

data-based, with established criteria to activate such a pause, implemented via resolution or decision so that it would be subject to notice and comment.[129]

Cal Advocates recommends that staff be allowed to pause federal make-up under certain listed circumstances and with three months' notice to providers.[130] Somewhat similarly, AirVoice recommends that, if staff is delegated the authority to pause federal make-up support, the authority should be subject to clear, objective, and narrowly defined circumstances limited to verified Program integrity concerns, material discrepancies in eligibility verification including sustained mismatches between federal and state enrollment determinations, and operational or system failures.[131]

We believe certain conditions could require immediate action to temporarily suspend or waive G.O. 153-A provisions, including those allowing for federal make-up, in less time than would be possible should such changes always require a Commission decision. We agree, however, that this authority, including authority to pause federal make-up provisions, should be limited. G.O. 153-A Section 15 authorizes the Commission to revise the general order via staff resolution. We further formalize the mechanism whereby, in temporary and exigent situations, provisions of G.O. 153-A may be temporarily waived or suspended by resolution and by Executive Director action.

Allowing for temporary suspension or waiver of G.O. 153-A provisions via Commission resolution provides an opportunity for notice of and comment on proposed temporary waivers while presenting a lower barrier than requiring waiver or modification via Commission decision. Temporary waiver actions,

[129] TURN Opening Comments on the March Ruling at 6.

[130] Cal Advocates Opening Comments on the March Ruling at 5-6.

[131] AirVoice Opening Comments on the March Ruling at 5.

including the Commission's suspension of certain LifeLine requirements during Covid-19, occurred via assigned Commissioner's ruling. The specific limitations on Commission ability to temporarily suspend or waive general order provisions are formally adopted via this decision and discussed in full below.

Cal Advocates and CforAT recommend the Commission require LifeLine providers to submit cost of service information to ensure the continued reasonableness of the LifeLine subsidy when considering extension of federal make-up.[132] Despite its recommendation for a "fiscal analysis" of this decision, AT&T opposes this recommendation as it pertains to incumbent local exchange carriers, stating that a cost of service analysis is not relevant, given the 20 year old determination that the telecommunications market is competitive.[133] While we decline to take up consumer advocates' recommendation at this time, we may consider this recommendation later in the proceeding.

4.3. Data Collection

The March Ruling asked parties to comment on whether the Commission should collect additional information from providers to ensure, a) that providers are communicating to customers the information necessary for customers to make informed decisions regarding Program participation, and b) that providers are continuing to be good stewards of the California LifeLine Program funds.

Of the provider and provider representative commenters, only Verizon agreed that additional reporting is warranted.[134]

---

[132] Cal Advocates Opening Comments on the March Ruling at 5, 7. CforAT Reply Comments on the March Ruling at 4.

[133] *See* AT&T Reply Comments on the March Ruling at 12-13 (citing D.06-08-030).

[134] Verizon Opening Comments on the March Ruling at 9 (suggesting "[t]racking how many customers fail to enroll in both state and federal programs and the associated reasons."). *But see* Assurance Opening Comments on the March Ruling at 10 (stating that Assurance isn't aware of

Footnote continued on next page.

TURN recommends that the Commission require providers to report on the number of customers that contact providers with questions regarding enrollment and renewal issues, and resolution and escalation rates for these calls, to illustrate trends the Program is facing.[135] Given the potentially overlapping causes of calls with questions regarding enrollment and renewal issues, we decline to require this information at this time. Other data collection, described below, may more specifically illustrate Program impacts.

For example, TURN recommends that the Commission require providers to submit monthly enrollment counts for subscribers who are subscribed to state-only, federal-only, and both programs from February 2025 through at least February 2027, to determine a baseline and then assess the impact the program split may have on dual enrollment rates.[136] Verizon and CforAT make a similar recommendation, with CforAT adding that the Commission should also collect data on the number of customers that did not respond to renewal requests. Verizon suggests the Commission track "how many customers fail to enroll in both state and federal programs and the associated reasons."[137] TURN also notes

additional data that could be collected from providers). *See also* AT&T Opening Comments on the March Ruling at 6. We note that AT&T lists several sources of existing Commission audit and compliance authority, stating that such authority obviates the need for additional provider reporting. The preexistence of remittance audit, data collection, inspection, and other compliance authority, including Pub. Util. Code Section 314, is not justification for the Commission not to exercise such authority to require reporting in this decision. *See also* G.O. 153-A § 9.3.10, which allows for reimbursement of the incremental costs of new LifeLine reporting requirements.

[135] TURN Opening Comments on the March Ruling at 7-8.

[136] TURN Opening Comments on the March Ruling at 8.

[137] CforAT Opening Comments on the March Ruling at 6-7. Verizon Opening Comments on March Ruling at 9.

that the FCC is considering additional federal Lifeline changes that could decrease the number of Californians eligible for federal Lifeline.[138]

We agree that monitoring enrollment data will be useful in analyzing the impacts of the FCC Order and potential changes in federal Lifeline eligibility that may be adopted by the FCC. We require providers to serve on the service list monthly enrollment totals in the following categories: (1) subscribers enrolled only in California LifeLine; (2) the subset total of those customers that the TPA has qualified for California-Only federal support make-up; (3) subscribers enrolled in California and federal Lifeline; and (4) to the extent such customers exist, federal-only enrollment data for subscribers with California addresses from February 2025 through calendar year 2027. The data shall reflect months' end totals. Historical monthly totals shall be served within 30 days of the adoption of this decision. Future monthly totals shall be served quarterly thereafter, by close of business on the seventh day after each quarter, or the first business day following the seventh day after each quarter.

The TPA currently collects data on renewal rates; the TPA will report to Communications Division the historical and future monthly counts of renewal notices sent, and renewal notices responded to from February 2025, through calendar year 2027, and post this information on the same Commission website on which the TPA posts monthly LifeLine enrollment data.[139]

TURN also recommends that the Commission publicly report information on providers' compliance with monthly usage checks and Program

---

[138] TURN Opening Comments on the March Ruling at 10-11.

[139] California Public Utilities Commission website, "California LifeLine Related Forms and Notices for Service Providers," *available at* https://www.cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/lifeline/lifeline-related-forms-and-notices-for-service-providers (last visited June 3, 2026).

disenrollments for non-usage. TURN states that publication of this information "is a useful accountability tool, as outside parties may use it as the basis for their own unique analyses and recommendations."[140] At this time, we decline to require the ongoing public posting of provider monthly reporting requirement compliance rates. While we agree that accountability makes for good LifeLine stewards, processes are already in place to hold service providers accountable for noncompliance when necessary.[141]

4.4. Renewal Processes

Following implementation of the FCC Order, California LifeLine subscribers are required to annually recertify eligibility for California LifeLine separately from eligibility recertification for federal Lifeline. Because the TPA is no longer able to make final federal eligibility determinations, enrollment approval for each program may come on different dates. This means that the annual eligibility renewal process for each program may also fall on different dates, further complicating administrative processes for participants and providers. California LifeLine renewal is achieved either through automated database verification or via completion of a renewal form sent to subscribers by the TPA.[142] Federal renewal occurs via automated database check; if USAC cannot re-establish eligibility via database check, USAC will send federal Lifeline subscribers a recertification form.[143] Many commenters identify the confusion two separate renewal processes may cause and the associated burden on LifeLine

---

140 TURN Opening Comments on the March Ruling at 8-9.

141 *See* Res. T-17601.

142 *See* G.O. 153-A § 2.41.

143 USAC Website, "Recertification," *available at* https://www.usac.org/lifeline/national-verifier/recertification/ (last visited May 18, 2026).

participants. TURN recommends that the Commission require providers to conduct outreach as federal renewal dates draw near.[144]

The TPA will update the instructions for the California LifeLine renewal form to remind customers that the California LifeLine renewal process is separate from the federal Lifeline renewal process, and that federal Lifeline customers will have to fulfill any federal renewal requirements separately and likely on a different date, to continue to be eligible for federal subsidies. We will also update the California LifeLine website renewal information page to include similar information.

The customer outreach and education materials we require LifeLine providers to submit in section 4.1.4 of this decision may include examples of renewal reminders that contain or provide links to similar information, though we do not require this, as recommended by TURN. Providers are not currently required by G.O. 153-A to send California LifeLine renewal notices, though they are reimbursed by the Program to the extent that they do. Providers are encouraged to send explanatory information in renewal reminders. Service providers may, and are encouraged to, send renewal reminders to federal subscribers who are not automatically recertified through USAC's automated database check, as another form of ensuring they continue to receive federal subsidies for subscribers that the TPA may categorize as eligible for federal Lifeline.

4.5. Additional Guidance Related to Program Implementation Following the FCC's Order

A number of comments contained questions regarding Commission interpretation of certain rules following the FCC's Order. While these questions

[144] TURN Opening Comments on the March Ruling at 2.

may not involve or lead to Program changes, this decision is an opportunity for the Commission to respond.

- How will the Commission interpret the one-household rule,[145] which limits households to one LifeLine subscription each?[146]

The Commission interprets this rule as limiting households to one California LifeLine subscription per household. Whether the LifeLine subscriber or another member of the LifeLine subscriber's household also has a federal Lifeline subscription has no bearing on the Commission's interpretation of this requirement.[147]

- How will non-usage issues be addressed?[148]

The Commission will apply G.O. 153-A's non-usage rule independently of USAC's application of federal rules. The Commission's application of its non-usage rule impacts only California LifeLine subscriptions.

- How does the passage of Pub. Util. Code Section 876.5 impact coordination between state and federal programs?

As noted above, Pub. Util. Code Section 876.5 prohibits the Commission, staff, the TPA, LifeLine service providers, and related agents from sharing:

> any information provided by an applicant or subscriber to the lifeline program […with] the federal government without a court-ordered subpoena or valid judicial warrant.

An exception in subsection (b) states that the provision,

---

[145] *See* Pub. Util. Code § 878 (a).

[146] *See* Assurance Opening Comments on the March Ruling at 8.

[147] *See* Verizon Opening Comments on the March Ruling at 5. TURN Reply Comments on the March Ruling at 4.

[148] Assurance Opening Comments on the March Ruling at n.12.

> does not prohibit the furnishing of applications, records, and data to other public agencies to the extent required for verifying an applicant's or subscriber's eligibility for lifeline service.

Pub. Util. Code Section 876.5 was passed and enacted before the FCC issued its Order.

Many commenters ask whether a single application may be used to allow applicants to apply to state and federal Lifeline simultaneously, or whether a process might be used that would pull data from common application fields to populate separate federal and state applications online.[149]

Pub. Util. Code Section 876.5 governs the California LifeLine Program and was enacted to protect California LifeLine applicants and subscribers from disclosure of their personal information for non-California LifeLine purposes. As noted above, previously, a single application was used to qualify applicants for both California and federal Lifeline programs. That unified enrollment process has since changed following the FCC's revocation of California's opt-out status, resulting in the separation of California LifeLine and federal Lifeline enrollment processes. The separate federal Lifeline enrollment process is not subject to Pub. Util. Code Section 876.5.

In the context of the Moore Act as a whole, "lifeline service" in Pub. Util. Code Section 876.5(b) refers to California LifeLine service.[150] Section 876.5(b) allows sharing with other public agencies to verify eligibility for California

[149] *See, e.g.,* TURN Opening Comments on the March Ruling at 9.

[150] *See* TURN Reply Comments on the OIR at n.14. For example, Section 873 requires the Commission to set the rates and charges for lifeline service and develop eligibility criteria for that service — actions the Commission is unable take to modify federal Lifeline service. This interpretation limits the exception to the information sharing prohibition to those circumstances when sharing is needed to establish California LifeLine eligibility.

LifeLine only. This exception does not allow Commission staff, the TPA, or service providers to share California LifeLine applicant information with the federal government to aid the federal government in establishing an applicant's federal Lifeline eligibility.

However, consistent with the Moore Act's purpose, and further supported by Pub. Util. Code Section 875(b), which requires the Commission to "establish procedures necessary to ensure that the lifeline telephone service program qualifies for any federal funds available for the support of those programs,"[151] we interpret the Pub. Util. Code Section 876.5 as intending to avoid creating barriers for customers applying for either Lifeline program.

We therefore find that the program(s) to which the applicant is applying determines the applicable legal requirements regardless of whether an applicant submits one application or two, or whether the same information is used for both California and federal Lifeline programs.

If a service provider seeks to implement a dual program enrollment application, the service provider remains responsible for compliance with Pub. Util. Code Section 876.5. Any applicants to both programs must be afforded clear instructions about the privacy and information sharing protections afforded to California LifeLine applicants. An applicant to both programs must receive proper notice of these protections and knowingly and affirmatively consent to being a dual program applicant. Per USAC, service providers may "submit federal applications on applicants' behalf after obtaining consent."[152] The

---

[151] *See* Assembly Bill 1303 Assembly Floor Analysis, Sept. 9, 2025.

[152] *See* slide 16 in the National Verifier 101 slide deck presented by USAC at the January 14, 2026, National Verifier 101 webinar. USAC, National Verifier 101 webinar materials, *available at* https://www.usac.org/wp-content/uploads/lifeline/documents/training/2026/Lifeline-

Footnote continued on next page.

affirmative consent establishes that the applicant is a dual program applicant and consents to disclosure of application information it provides to apply for federal Lifeline to the federal government. Service providers must obtain consent from dual program applicants before the applicant begins providing other application information and before the provider shares any such applicant information with the federal government. The affirmative consent procedures required by this decision must inform customers that the Social Security Number information a dual program applicant provides to qualify for federal Lifeline will be shared with the federal government.

If any entity tasked with administering application assistance for federal and California LifeLine programs elects to: (1) implement a dual enrollment process where an applicant provides information once that will be used to populate fields in both a federal and state application; or (2) implement a common application, such entity must ensure that its enrollment process protects California LifeLine applicants' information in accordance with Pub. Util. Code Section 876.5(a) and that federal Lifeline enrollment complies with federal Lifeline requirements. Applications for California LifeLine must also comply with the dual application pathway required in D.25-10-033.[153]

In sum, informed, affirmative consent to be a dual program applicant requires providers to inform customers of the difference in enrollment requirements specific to the provision of Social Security Numbers and to require applicants to confirm their consent to be a dual program applicant, either

January-2026-Monthly-Webinar-National-Verifier-101.pdf. USAC states: "Service providers may submit an online application on the consumer's behalf (with the consumer's consent) using the National Verifier service provider portal."

[153] For the dual application pathway requirements, *see* D.25-10-033, sections 3.1.2 and 3.1.3, at 11-16.

verbally (with an application field indicating verbal confirmation to be filled out by the applicable customer service representative), via box check completed by the applicant, or by other method subject to Commission approval. Service providers seeking to implement a dual program enrollment process must submit a Tier 2 advice letter with the proposed language the provider seeks to use to inform the applicant of the separate administration of the programs, and diminished privacy and data sharing protections because their information will be provided directly to a federal agency. The advice letter shall also inform the Commission of the proposed placement of the required information and check box indicating affirmative consent and/or provide customer service representative scripts that incorporate these affirmative consent requirements. If the service provider intends to use a method other than or in addition to a check box or verbal confirmation via customer service representative to indicate consent, the advice letter should contain a description of this additional method.

This decision requires LifeLine service providers to inform customers that the programs are now administered separately in a number of ways, including application instructions. Therefore, the advice letter shall also contain proposed language that augments or clarifies the notice requirements amended by this decision and reflects the proposed dual enrollment process, to prevent further confusion regarding what aspects of the programs are coordinated by virtue of the dual enrollment process.

5. Revisions to General Order 153-A

As noted in the March Ruling, changes to the federal program have necessitated updates to G.O. 153-A to reflect the new reality of separate federal Lifeline and state LifeLine programs. Permanent emergency disaster relief provisions must also be incorporated into the General Order. While we agree with the Small LECs, who initially noted that updating the General Order at this stage of the proceeding could render later updates unnecessary or obsolete,[154] the Commission is endeavoring to match the General Order to reality to the greatest extent possible. Discrepancies between the many Commission decisions governing LifeLine and the General Order can cause confusion and uncertainty and may decrease compliance.[155]

Attachment A to this decision provides redlines consistent with the program changes adopted via this decision. In particular, the redlines implement the following measures:

- Updates to the information the TPA is required to provide in application instructions and renewal notice instructions;
- Updates to the enrollment processes and notice requirements applicable to LifeLine service providers;
- Clarification of the applicability of federal make-up support;
- Updates to clarify that the "one-household" rule limits a household to one California LifeLine supported service;
- A new section that contains the permanent emergency disaster relief mechanisms adopted via this decision.

Finally, as discussed above, this decision updates G.O. 153-A to allow for a temporary waiver or suspension of G.O. 153-A's provisions via staff resolution or for the Executive Director, in appropriate cases, to take immediate action to protect the health and welfare of LifeLine subscribers and the LifeLine Program, subject to future ratification, if necessary, by the Commission. This may include

---

[154] Small LECs Reply Comments on the OIR at 3.

[155] CforAT Opening Comments on the OIR at 6. *See also* Assurance Opening Comments on the OIR at 9, "invit[ing] the Commission to update the General Order as promptly as possible after the adoption of any program changes to minimize the possibility of confusion […]."

temporary suspension or waiver of G.O. 153-A provisions in the case of: (1) governor or president-declared emergencies that do not impact utility service; or (2) when the Commission becomes aware of the potential for waste, fraud, or abuse occurring on a program-wide basis. These mechanisms provide needed flexibility to protect Program participants and to safeguard the LifeLine Fund.

Requiring the notice of waiver or suspension to list either the declared emergency warranting suspension/waiver of program requirements or the basis of its preliminary determination of program-wide waste, fraud, or abuse limits this tool's applicability to specific circumstances. To this end, G.O. 153-A should be revised to include the following language in Section 15:

> 15.2. Provisions of the General Order, not otherwise required by applicable law, may be temporarily waived and/or suspended via staff resolution. A staff resolution temporarily waiving provisions of this General Order shall state justification for and the anticipated duration of the temporary waiver and/or suspension.
>
> 15.3. The Executive Director may temporarily waive and/or suspend provisions of this General Order on an emergency basis. A notice issued pursuant to this section shall be served on the service list for the California LifeLine Program rulemaking. If no California LifeLine rulemaking is open, the notice shall be served on the service lists of other customer programs related communications proceedings and shall be provided via administrative letter to all California LifeLine Service Providers.
>
> 15.3.1 The Executive Director may temporarily waive and/or suspend provisions of this General Order when immediate action is necessary to protect the health and welfare of LifeLine subscribers and the LifeLine Program, subject to future ratification, if necessary, by the Commission. Such actions are allowable:

15.3.1.1 Upon a California governor or presidential declaration of a state of emergency in California that does not impact utility service 24 hours after the declaration and so does not activate implementation of the automatic disaster relief protections described in Section 16; or

15.3.1.2 Upon receipt of information from California LifeLine staff establishing the existence of waste, fraud, or abuse of a specific LifeLine provision(s) that impacts the integrity of the LifeLine Fund.

15.3.2 The temporary suspension and/or waiver of General Order provisions pursuant to this section may extend for 90 days. The temporary suspension and/or waiver is automatically continued for a further period when a resolution extending the suspension and/or waiver has been issued. The emergency suspension and/or waiver will then extend until the Commission acts on the resolution and may include any additional duration adopted by the Commission.

15.3.3 Any notice temporarily waiving and/or suspending provisions of this General Order pursuant to subsections 15.3.1, above, shall state the basis of the emergency notice, the provisions of the General Order to be suspended and/or waived, and the anticipated duration of the temporary waiver and/or suspension.

15.3.3.1 If the temporary waiver and/or suspension of General Order provisions is pursuant to subsection 15.3.1.2, above, the notice may also provide a description of the waste, fraud or abuse, a description of the measures the Commission intends to take to address the fraudulent activity within the duration of the temporary suspension, and an explanation of why the emergency action is necessary.

Finally, the Small LECs recommend that the Commission modify G.O. 153-A to eliminate the requirement that LifeLine providers include detailed pricing breakdowns for LifeLine rates in their tariffs. Provider tariffs currently include pricing breakdowns that illustrate how state and federal subsidies may stack to reduce basic service rates and additional mandatory charges and fees, to illustrate the rates ultimately collected from customers. According to the Small LECs, customers are not interested in the distribution of federal and state support that is currently illustrated in tariffs.[156] TURN opposes this recommendation, noting that tariffs are used by the Commission and third parties to ensure accountability of Program providers.[157]

We agree with TURN. The breakdown of LifeLine-discounted rates in tariffs continues to be useful information for the Commission and third parties, including customers, who now, more than ever, may be interested in the way the two programs' separate subsidies may apply against basic service rates. To the extent that the Small LECs justify this recommendation based on the potential elimination of federal make-up provisions,[158] this decision makes no changes to those provisions.

6. Summary of Public Comment

Rule 1.18 of the Commission's Rules of Practice and Procedure (Rules) allows any member of the public to submit written comment in any Commission proceeding using the "Public Comment" tab of the online Docket Card for that

---

[156] Small LECs Opening Comments on the March Ruling at 7, 10.

[157] TURN Reply Comments on the March Ruling at 6.

[158] *See* Small LECs Opening Comments on the March Ruling at 10.

proceeding on the Commission's website. Rule 1.18(a) requires that all written public comment submitted prior to the submission of the proceeding are part of the administrative record of the proceeding. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding.

There is one public comment listed on the Docket Card for this proceeding. The commenter opposes eliminating or reducing California LifeLine service and urges the Commission to reject any proposal that would weaken the Program or allow carriers, especially AT&T, to discontinue reliable copper landline service. The commenter notes the benefits of California LifeLine and copper landline service for many California constituencies, including low-income Californians and people with disabilities.

7. Conclusion

The Commission will implement permanent disaster relief protections for California LifeLine subscribers as described herein. The protections will help ensure that low income Californians retain necessary communications services access following a disaster.

The outreach and education requirements adopted herein will help customers better understand the impacts of the FCC's Order on state and federal Lifeline. The data collection requirements will inform the Commission as to Program changes that could be required in the future as additional impacts become evident. The Commission will continue to work to ease administrative burdens stemming from the FCC's Order.

Finally, the updates to G.O. 153-A adopted herein will formalize the Program changes made by this decision, providing clarity to stakeholders. Modifications that allow the Commission to quickly adapt to changing Program needs will ensure the Commission can act nimbly to protect LifeLine subscribers and the LifeLine Fund.

8. Comments on Proposed Decision

The proposed decision of Commission President John Reynolds in this matter was mailed to the parties in accordance with Pub. Util. Code Section 311 and comments were allowed under Rule 14.3. Comments were filed on ____________________, and reply comments were filed on ____________________ by ____________________.

9. Assignment of Proceeding

Commission President John Reynolds is the assigned Commissioner and Eileen Odell is the assigned ALJ in this proceeding.

Findings of Fact

1. Prompted by major wildfires in 2017, the Commission adopted Res. M-4833 and Res. M-4835 which suspended the LifeLine non-usage rule and renewals requirements for four months.
2. In D.18-08-004, the Commission adopted Res. M-4833 and Res. M-4835 disaster relief protections on an interim basis. These protections became effective upon specific declarations of emergency while the Commission's emergency disaster response rulemaking, R.18-03-011, was pending.
3. While the Commission adopted a permanent emergency disaster relief program applicable to communications service providers via D.19-08-025, the Commission declined to adopt LifeLine-specific protections in that decision.
4. The Commission has addressed emergency disaster relief protections for LifeLine customers on an ad hoc basis since R.18-03-011 closed, using assigned Commissioner rulings to temporarily waive certain program requirements.

5. There is a need for Commission consideration of disaster preparedness and disaster relief for California LifeLine participants as California experiences the harsh effects of climate change, which increases the probability and severity of disasters like wildfires.

6. A lack of self-implementing, automatic emergency disaster relief protections for LifeLine customers could cause harmful delays in the implementation of relief and uncertainty of the potential terms of relief for providers and participants.

7. The risk of delay and uncertainty that would accompany continuing to address emergencies on an ad hoc basis and the attendant impacts on LifeLine participants outweigh the risk of inflexibility.

8. The Commission should not make implementation of its emergency disaster response contingent on federal waiver of LifeLine rules.

9. The adoption of permanent disaster relief mechanisms could contribute to the need to increase the LifeLine surcharge.

10. A requirement that wireless LifeLine service providers offer service activation/connection and conversion at no cost to the consumer during qualifying emergencies and temporary waiver of the LifeLine non-usage rule and renewal requirements will help ensure that LifeLine customers impacted by a disaster do not lose access to essential communications service.

11. In D.19-08-025, the Commission required communications service providers to conduct outreach and education before and during a disaster using means listed in CoL 48 of that decision and granted providers flexibility to use the listed communication mediums and outreach measures where and how appropriate.

12. 2-1-1 service plays a critical role in providing information in times of disaster and assists residents of affected areas in accessing information about evacuation, shelter, food, and medical and recovery services.

13. There is a public interest in waiving service activation fees for wireless LifeLine participants who are impacted by a disaster.

14. The emergency disaster relief program applicable to communications service providers adopted by the Commission in D.19-08-025 is activated by California governor or presidential declaration of a state of emergency, other than by drought, where the disaster has caused: (1) a disruption of the delivery or receipt of utility service; and/or (2) the degradation of the quality of the utility service to residential and small business customers; certain fee relief provisions are activated when that utility service disruption and/or degradation lasts longer than 24 hours following the beginning of the disaster.

15. A default 30-day disaster relief protection duration will allow impacted LifeLine customers time to recover lost documents to reestablish eligibility or to replace a lost device.

16. The non-usage rule and renewal requirements were adopted to prevent waste, fraud, and abuse in the LifeLine Program.

17. Conditions may exist when the Commission should extend LifeLine customer disaster relief either when the automatic protections adopted by this decision are not indicated, such as during the Covid-19 pandemic, or when the Commission should extend relief longer than a minimum 30-day duration.

18. Receipt of other forms of disaster relief does not necessarily establish that the recipient is low income.

19. The Commission may seek waivers of the non-usage rule and renewal requirements from the FCC during disasters to promote alignment of eligibility requirements.

20. D.19-08-025 requires communications service providers to file a Tier 1 advice letter within 15 days of the governor's or president's state of emergency proclamation reporting compliance with implementing that decision's mandated emergency disaster relief customer protections and outreach activities.

21. G.O. 153-A Section 7.10 requires LifeLine service providers to submit LifeLine consumer education and/or marketing materials, including scripts used by customer service representatives, to the Communications Division for review and approval prior to dissemination to the public.

22. D.19-08-025 requires providers to submit Tier 1 advice letters 12 months after the initiation of that decision's disaster relief, reporting compliance activities and metrics about the impacts of the disaster relief, including estimates of the numbers of benefitting customers.

23. The FCC issued an Order, effective February 1, 2026, that revoked the waiver that enabled California to opt out of the use of the NLAD for the federal Lifeline program. The Order also adjusted the federal Lifeline National Verifier processes in California to end the use of state eligibility determinations for enrollment in federal Lifeline.

24. The FCC's Order effectively transferred federal Lifeline enrollment and renewals process responsibilities from the TPA to USAC.

25. Since February 1, 2026, California LifeLine and federal Lifeline have operated separate enrollment and renewal processes for each program.

26. The TPA will continue to make California LifeLine eligibility determinations during the application and renewals processes, while USAC will

make federal Lifeline determinations during its own, separate implementation of these processes.

27. The FCC's Order has created customer confusion and increased barriers to customer applications for federal Lifeline, potentially decreasing the rate at which customers apply for or finish federal applications.

28. Some providers say that, since implementation of the FCC's Order, they have seen decreased rates of customer enrollment in the federal program.

29. In pertinent part, Section 876.5 prohibits the TPA, the Commission, LifeLine staff, LifeLine providers and their agents from sharing California LifeLine applicant and subscriber information with the federal government without a court-ordered subpoena or valid judicial warrant.

30. The Commission intends to implement Customer Portal 2.0 in 2027.

31. Adopting enrollment in federal Lifeline as an automatic qualifier for California LifeLine would ease burdens for customers and providers.

32. The Commission does not have access to real time federal enrollment data that would allow the Commission to adopt enrollment in federal Lifeline as an automatic qualifier for California LifeLine.

33. The California LifeLine Program makes up the difference in funding for certain subscribers that do not qualify for federal funding, referred to as "California-Only" subscribers.

34. While the FCC's Order did not change the eligibility rules for federal make-up, there is concern that an uptick in claims for federal make-up support may result from customers' failure to complete federal applications, rather than differences between federal and state eligibility criteria and service standards that the Program intends federal make-up to support.

35. Applicants must qualify for federal Lifeline or be eligible for California-Only subsidies for providers to continue to receive the maximum subsidies available, so providers are incentivized to encourage eligible applicants to apply to federal Lifeline.

36. While the providers are likely incentivized to prompt applicants to fill out federal applications, there is still the potential for providers to disclaim responsibility for ensuring that applicants are aware they must submit two applications to qualify for federal and state subsidies, instead hoping to rely on California subsidies to make up for a lack of applicant engagement with the federal program.

37. The TPA will continue to review California applications to determine whether an applicant qualifies for federal make-up pursuant to G.O. 153-A, which limits federal make-up reimbursement to California-Only customers.

38. To broaden the scope of federal make-up at this time would reduce provider incentives for ensuring the federal program continues to be fully utilized.

39. Most LifeLine subscribers apply through service providers and their agents, and customers receive monthly bills and customer support from providers.

40. Customers enrolled in federal Lifeline and California LifeLine will likely have different annual renewal dates for each program moving forward.

41. Conditions could warrant modification, suspension, or waiver of G.O. 153-A provisions, including those allowing for federal make-up, in less time than would be possible should such changes always require a Commission decision or resolution.

42. Submission of ongoing enrollment data through calendar year 2027 will be useful in monitoring the impacts of the FCC's Order on the LifeLine Program.

43. The TPA currently collects data on subscriber renewal rates.

44. The Program(s) to which the applicant is applying determines the applicable legal requirements regardless of whether an applicant submits one application or two, or whether the same information is used for both California and federal Lifeline programs.

45. Pub. Util. Code Section 875(b) requires the Commission to "establish procedures necessary to ensure that the lifeline telephone service program qualifies for any federal funds available for the support of those programs.

46. If a service provider seeks to implement a dual program-enrollment application, the service provider remains responsible for compliance with Pub. Util. Code Section 876.5.

Conclusions of Law

1. It is reasonable to adopt permanent, automatic, and geographically tailored disaster relief protections for California LifeLine participants to quickly protect LifeLine customers from loss of service in the event of a disaster, to ensure customers that they can rely on continuity of access to discounted service, to provide greater certainty to providers of a minimum level of Commission expectations, and to reduce impacts to the surcharge, to the extent feasible.

2. It is reasonable to adopt an automatic duration for disaster relief protections of one month. To the extent utility service is still disrupted and/or any related evacuation/shelter-in-place restrictions are still in place at the end of the one-month period, it is reasonable to extend the consumer protections for an additional 30 days from the date that service is restored, and evacuation or shelter-in-place orders are lifted.

3. It is reasonable to waive the California LifeLine rules governing non-usage and renewal requirements upon California governor or presidential declaration of a state of emergency when the disaster has caused: (1) a disruption of the delivery or receipt of utility service; and/or (2) the degradation of the quality of the utility service to residential and small business customers and when that disruption and/or degradation lasts for greater than 24 hours following the beginning of the disaster.

4. It is reasonable to require wireless California LifeLine service providers to allow California LifeLine subscribers impacted by a qualified declaration of a state of emergency as described herein to activate/convert service without charge to the subscriber or, when applicable, the LifeLine Fund, while emergency disaster relief protections are activated.

5. California LifeLine service providers should be required to update the outreach plans submitted in compliance with D.19-08-025, OP 8, with information regarding how such providers intend to communicate disaster relief protections to customers affected by relevant disasters before and during a disaster.

6. California LifeLine service providers should be required to submit to the Communications Division the marketing and consumer education materials the providers will use to inform customers of the availability of LifeLine service and of the customer protections adopted by this decision before and during a disaster, pursuant to G.O. 153-A Section 7.10.

7. California LifeLine service providers should be required to inform 2-1-1 service providers of the availability of LifeLine service for low-income Californians and of the related consumer protections activated in relevant emergencies. LifeLine service providers should be required to provide 2-1-1

service providers with links to their California LifeLine websites to ensure this information can be disseminated via 2-1-1 in emergency situations.

8. California LifeLine service providers should be required to confirm implementation of the disaster relief required by this decision in the Tier 1 advice letters required by D.19-08-025 OP 2. If the Commission authorizes disaster relief for LifeLine customers in situations not defined in G.O. 153-A Section 16.1, *i.e.*, in situations when disasters do not activate the automatic LifeLine protections but for which the Commission has ordered ad hoc activation of emergency protections, providers should still be required to submit Tier 1 advice letters within 15 days of the implementation of disaster relief for LifeLine customers. In either case, the advice letters must include a description of the customer outreach performed to inform affected customers of the availability of LifeLine service and to inform LifeLine participants of the protections available to them for the 30 days or other designated period following the disaster declaration.

9. California LifeLine service providers should be required to report to the TPA the number of customers to whom providers would have issued a non-usage notice under G.O. 153-A Section 5.7.2 during a declared emergency, but for implementation of disaster relief protections within 45 days of the conclusion of implementation.

10. The TPA should track the number of renewal notices that it did not issue due to each declared emergency, the number of renewal notices issued to customers for whom renewal notices were deferred, and the renewal rate for deferred renewals.

11. It is reasonable for the emergency disaster relief required by this decision to become effective upon issuance of an administrative letter by the Communications Division to LifeLine service providers and the LifeLine service

lists after the TPA confirms its readiness to begin implementing the administrative changes the relief program requires.

12. G.O. 153-A should be revised as provided in Attachment A to reflect adoption of permanent disaster relief mechanisms applicable to LifeLine customers.

13. Staff should investigate opportunities to create a dual enrollment mechanism or otherwise streamline Program enrollment through development of Customer Portal 2.0.

14. Staff should investigate options for implementing inclusion of federal Lifeline as a program for which enrollment would qualify an applicant for California LifeLine under G.O. 153-A's programmatic eligibility criteria.

15. The Commission should require California LifeLine providers to update their websites and outreach and marketing materials, including call center scripts, application form notices, application instructions, and Annual LifeLine Notices consistent with the instructions herein to increase awareness of Program changes following implementation of the FCC's Order.

16. California LifeLine providers should be required to serve on the service list of this proceeding, on a quarterly basis, the monthly enrollment data that shows for each month since February 2025 and through calendar year 2027, as of months' end, the total number of subscribers each provider has in the following categories: California LifeLine enrollment only (no federal make-up), California LifeLine enrollment only (federal make-up), dual program enrollment, and federal Lifeline enrollment only. Historical monthly totals should be served within 30 days of the adoption of this decision.

17. It is reasonable to require providers implementing a dual program enrollment application to afford applicants proper notice of the privacy and

information sharing protections afforded to California LifeLine applicants and obtain affirmative consent to being a dual program applicant. Specifically, service providers seeking to implement a dual program enrollment process should submit a Tier 2 advice letter with the proposed language the provider seeks to use to inform the applicant of the separate administration of the programs, and diminished privacy and data sharing protections because their information will be provided directly to a federal agency. The advice letter should also inform the Commission of the proposed placement of the required information and check box indicating affirmative consent and/or provide customer service representative scripts that incorporate these affirmative consent requirements. If the service provider intends to use a method other than or in addition to a check box or verbal confirmation via customer service representative to indicate consent, the advice letter should contain a description of this additional method.

18. It is reasonable to modify G.O. 153-A to reflect Program realities and modifications following implementation of the FCC's Order that revoked California's ability to opt out of use of the National Verifier and NLAD.

19. G.O. 153-A should be revised as provided in Attachment A of this decision to reflect changes in Program application, enrollment, and renewals processes, notice requirements and other changes made necessary by the FCC's Order.

20. G.O. 153-A should be revised to allow temporary suspension and/or waiver of G.O. 153-A provisions to be proposed by staff and adopted via resolution as provided in Attachment A.

21. G.O. 153-A should further be revised as provided in Attachment A to allow the Executive Director to take immediate action and temporarily suspend or waive portions of G.O. 153-A to protect the health and welfare of LifeLine

subscribers and the LifeLine Program subject to future ratification, if necessary, by the Commission. This may include: upon a California-governor or presidential declaration of a state of emergency in California that does not impact utility service that requires permanent, automatic disaster relief protections; or upon receipt of information from staff or the TPA establishing fraud or abuse of a specific LifeLine provision(s).

O R D E R

IT IS ORDERED that:

1. Certain disaster relief protections applicable to California Universal Telephone Service Program shall apply upon and to the geographic area specified in a declaration of a state of emergency in California by the governor of California or the president of the United States, when the disaster has caused: (1) a disruption of the delivery or receipt of utility service; and/or (2) the degradation of the quality of the utility service to residential and small business customers and when that disruption and/or degradation lasts for greater than 24 hours following the beginning of the disaster.

2. The waived provisions shall include the rules governing non-usage, and annual renewal requirements. These certain disaster relief protections shall apply for a minimum of 30 days.

    (a) To the extent that utility service is still disrupted and/or any evacuation/shelter in place restrictions made necessary by the declared disaster are still in place at the end of the 30-day period, the waivers will be automatically extended until and for an additional 30 days from the date that service is restored, and evacuation or shelter-in place orders are lifted.

    (b) When an applicable disaster is declared in one of the ten most populous counties of the state, these protections shall be limited to customers residing in the zip codes impacted directly by and bordering the disaster area.

(c) The Communications Division Director may issue an administrative letter to LifeLine service providers and the LifeLine service lists clarifying the specific zip codes and/or the specific end date of the disaster relief protections. The administrative letter will also be posted to the Commission's website.

3. Upon activation and for the duration of the California Public Utilities Commission's permanent disaster relief mechanisms adopted herein, wireless California Universal Telephone Service Program (LifeLine) providers shall waive service activation and connection and conversion fees for impacted LifeLine subscribers.

4. California Universal Telephone Service Program (LifeLine) service providers shall submit a Tier 1 advice letter within 45 days of the effective date of this decision updating the outreach plans submitted in compliance with Decision 19-08-025, Ordering Paragraph 8, to include information regarding how such providers intend to communicate permanent disaster relief protections to customers affected by relevant disasters before and during a disaster.

5. California Universal Telephone Service Program (LifeLine) service providers shall inform 2-1-1 service providers of the availability of LifeLine service for low-income Californians and of the related consumer protections required in relevant emergencies. LifeLine service providers shall provide 2-1-1 service providers with links to their California LifeLine websites to ensure this information can be disseminated via 2-1-1 in emergency situations. Service providers shall confirm compliance with this Ordering Paragraph in the Tier 1 advice letters submitted to confirm updates of emergency disaster communication and outreach plans.

6. California Universal Telephone Service Program (LifeLine) service providers shall submit to a Tier 2 advice letter to the Communications Division for review and approval of the marketing and consumer education materials the providers will use to inform customers of availability of LifeLine and customer protections adopted by this decision before and during a disaster, pursuant to General Order 153-A Section 7.10 within 45 days of the effective date of this decision.

7. California Universal Telephone Service Program (LifeLine) service providers shall confirm implementation of the disaster relief required by this decision in the Tier 1 advice letters required by Decision 19-08-025 Ordering Paragraph 2 to be submitted within 15 days of a declaration of qualifying emergency. The advice letter must confirm implementation of the required relief and must include a description of the customer outreach performed to inform affected customers of the availability of LifeLine and to inform LifeLine participants of the protections available to them following the disaster declaration or other duration as specified in the authorizing instrument.

8. Service providers shall report to the California Universal Telephone Service Program (LifeLine) Third Party Administrator the number of customers who would have been issued a non-usage notice under General Order 153-A Section 5.7.2, but for implementation of disaster relief protections, within 45 days of the conclusion of disaster relief protections.

9. California Universal Telephone Service Program (LifeLine) service providers shall update their websites, LifeLine application notice forms and application instructions, Annual LifeLine Notices, and consumer education and marketing materials as described herein to inform customers of the impacts of the Federal Communications Commission's Wireline Competition Bureau's

November 20, 2025, Order, *In the Matter of Lifeline and Link Up Reform and Modernization.* Within 45 days of the effective date of this decision, LifeLine service providers shall submit to the Communications Division Tier 2 advice letters containing updated consumer education and marketing materials, including website screenshots, copies of notices and application instructions, and customer service representative scripts, consistent with the requirements of this decision.

10. Within 30 days of the effective date of this decision, California Universal Telephone Service Program (LifeLine) service providers shall serve on the service list of this rulemaking, data in Excel format showing from February 2025, up through the last full month prior to the effective date of this decision, monthly enrollment totals as of the end of each month for the following categories: California LifeLine enrollment only (no federal make-up), California LifeLine enrollment only (federal make-up), dual program enrollment, and federal Lifeline enrollment only for customers with California addresses.

11. California Universal Telephone Service Program (LifeLine) service providers shall serve on the service list of this rulemaking additional data each quarter providing monthly enrollment totals as of the end of each month for the following categories: California LifeLine enrollment only (no federal make-up), California LifeLine enrollment only (federal make-up), dual program enrollment, and federal Lifeline enrollment only for customers with California addresses. This quarterly reporting requirement must be completed by close of business on the seventh day after the end of each quarter after the initial data filing due within 30 days of the issuance of this decision, or the first business day following the seventh day after the end of each quarter and continues through calendar year 2027. This data must be served in Excel format.

12. California Universal Telephone Service Program (LifeLine) service providers seeking to implement a dual program enrollment process must submit a Tier 2 advice letter with the proposed language the provider seeks to use to inform an applicant of the separate administration of the California LifeLine and federal Lifeline programs, and of the diminished privacy and data sharing protections because their information will be provided directly to a federal agency. The advice letter shall also inform the California Public Utilities Commission of the proposed placement of the required disclosure information and check box indicating affirmative consent in the provider's application materials and/or provide customer service representative scripts that incorporate these affirmative consent requirements. If the service provider intends to use a method other than or in addition to a check box or verbal confirmation via customer service representative to indicate consent, the advice letter should contain a description of this additional method. This advice letter shall also contain proposed language that augments or clarifies customer notices and educational material regarding the relationship between California and federal LifeLine and reflects the proposed dual enrollment process, to prevent further confusion regarding what aspects of the programs are coordinated by virtue of the dual enrollment process.

13. The emergency disaster relief requirements or provisions adopted by this decision shall become effective on the date specified in an administrative letter to be issued by the California Public Utilities Commission's Communication Division after receiving confirmation from the Third Party Administrator (TPA) that the TPA can begin implementing the emergency disaster relief provisions.

14. The revisions to General Order 153-A indicated in Attachment A to this decision are adopted.

15. Rulemaking 25-11-005 remains open.

This order is effective today.

Dated _____________________, at Sacramento, California.

ATTACHMENT A

GENERAL ORDER 153-A